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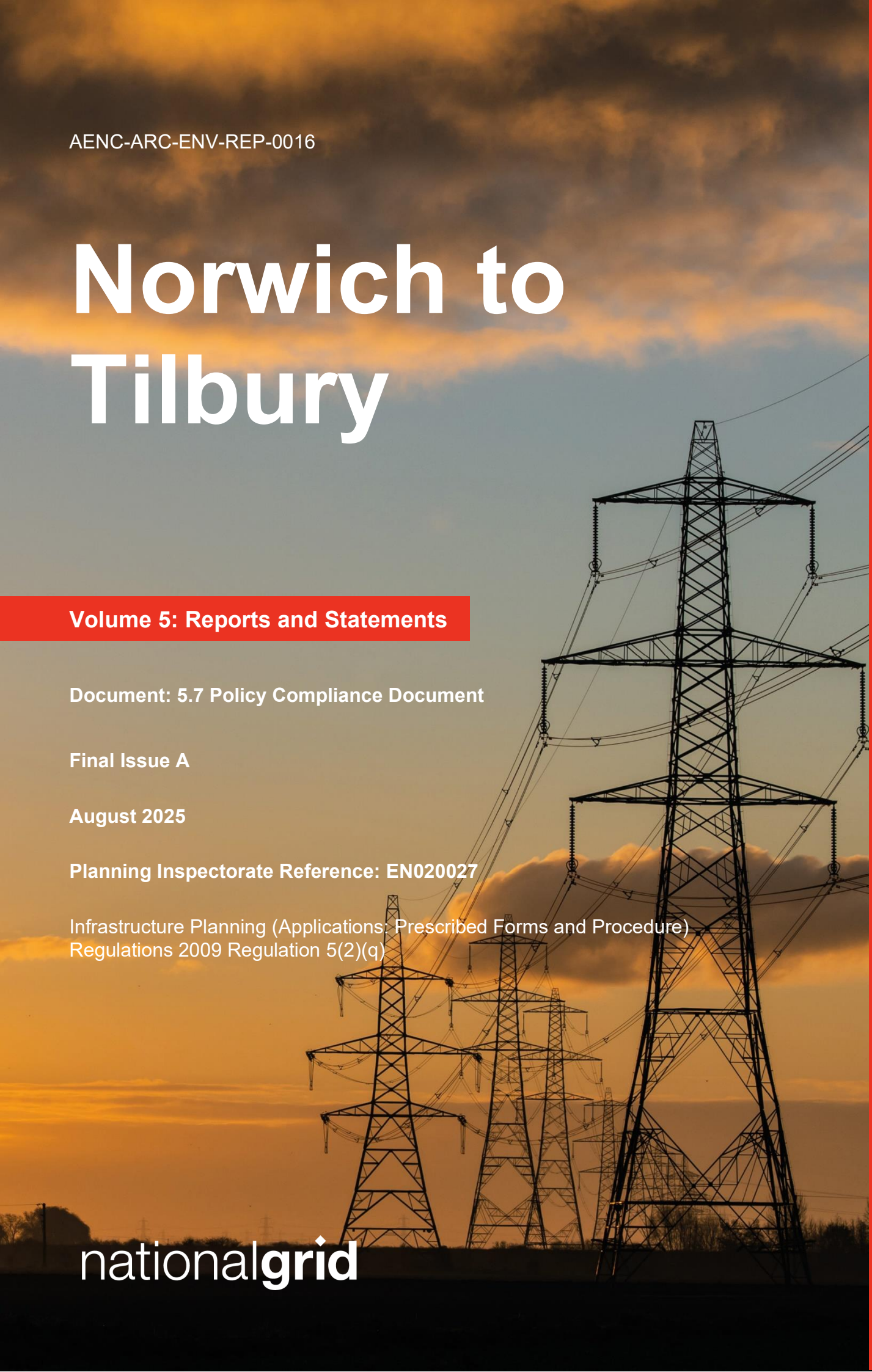

nationalgrid

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1. Introduction

Overview

1.1.1 National Grid Electricity Transmission plc ('National Grid') owns and maintains the national high voltage electricity transmission network throughout England and Wales.

1.1.2 The transmission network connects the power from where it is generated to the regional Distribution Network Operators who then supply businesses and homes.

1.1.3 National Grid holds the Transmission Licence for England and Wales, and its statutory duty is to develop and maintain an efficient, coordinated and economical system of electricity transmission and to facilitate competition in the generation and supply of electricity, as set out in the Electricity Act 1989.

1.1.4 National Grid has developed plans for Norwich to Tilbury (referred to as the 'Project' in this report). The Project would support the UK's net zero target through the connection of new low carbon energy generation in East Anglia and by reinforcing the transmission network.

1.1.5 The Project comprises reinforcement of the transmission network between the existing Norwich Main Substation in Norfolk and Tilbury Substation in Essex, via Bramford Substation, the new East Anglia Connection Node (EACN) Substation and the new Tilbury North Substation.

1.1.6 The reinforcement is needed because the existing transmission network, even with current upgrading, will not have sufficient capacity for the new renewable energy (a substantial proportion of which would be generated by offshore wind) that is expected to connect to the network over the next 10 years and beyond. Completion of the Project, together with other new reinforcements across the country, will meet this future energy transmission demand both in East Anglia and across the UK.

1.1.7 The Project is a Nationally Significant Infrastructure Project (NSIP), and National Grid is seeking development consent under statutory procedures set by government. NSIPs are projects of certain types, over a certain size, which are considered by the government to be of national importance, hence permission to build them needs to be given at a national level, by the relevant Secretary of State (in this case the Secretary of State for Energy Security and Net Zero). Instead of applying to the local authority for planning permission, the developer must apply to the Planning Inspectorate for a Development Consent Order (DCO) that would grant development consent.

1.1.8 Section 104(2) of the Planning Act 2008 sets out the matters to which the SoS must have regard in deciding an application submitted in accordance with the Planning Act 2008. In summary, the matters set out in section 104(2) include any relevant NPS, any local impact report (LIR); and any other matters the SoS thinks are both important and relevant to the decision.

1.1.9 Section 104(3) of the Planning Act 2008 requires that the SoS must decide an application for development consent in accordance with any relevant National Policy Statement (NPS), except to the extent that the SoS is satisfied that, in summary:

(i) doing so would lead to the United Kingdom being in breach of its international obligations

(ii) doing so would lead to the SoS being in breach of any duty imposed on the SoS under any enactment

(iii) doing so would be unlawful under any enactment

(iv) the adverse impact of the proposed development would outweigh its benefits, or

(v) that any prescribed condition for deciding the application otherwise than in accordance with the NPS would be met.

1.1.10 The relevant NPS for the Project is, therefore, of primary importance to the decision maker in considering the need for the Project and its acceptability in terms of the policy guidance in the relevant NPS.

1.1.11 For the Project, there are two relevant NPS, the Overarching NPS for Energy (EN-1) (Department for Energy Security and Net Zero, 2024a) and the NPS for Electricity Networks Infrastructure (EN-5) (Department for Energy Security and Net Zero, 2024b). EN-1 provides the overarching policy framework for making decisions on development consent applications for energy infrastructure in England, and EN-5 is specifically related to electricity networks infrastructure and does not directly address need. The National Policy Statement for Renewable Energy Infrastructure (EN-3) (DESNZ, 2024c) is also relevant in so far as the NPS includes support for the onshore infrastructure required to deliver new offshore wind developments.

1.1.12 In April 2025, the government launched a consultation on proposed changes to EN-1, EN-3 and EN-5 that ended on 29 May 2025. The consultation covers updates to all three NPSs for new energy infrastructure:

- Draft: Overarching National Policy Statement for Energy (EN-1) (DESNZ, 2025a)
- Draft: National Policy Statement for Electricity Networks Infrastructure (EN-5) (DESNZ, 2025b)
- Draft: National Policy Statement for Renewable Energy Infrastructure (EN-3) (DESNZ, 2025c)

1.1.13 Changes consulted upon in the draft 2025 updates to the energy infrastructure NPSs include alignment with Clean Power 2030 targets and endorsement of the Centralised Strategic Network Plan. The 2025 revisions have strengthened the process for delivering major new infrastructure, reinforcing the government's ambition to deliver clean power by 2030.

1.1.14 The transitional provisions on the status of the 2025 revisions say:

'*While the review is undertaken, the current suite of energy NPS remain relevant government policy and EN-1 to EN-5 have effect for the purposes of the Planning Act 2008. The Secretary of State has decided that for any application accepted for examination before amending the energy NPSs, the current suite of energy NPS, published in 2024, should have effect. The amended energy NPSs will therefore only have effect in relation to those applications for development consent accepted for examination after the publication of the final amended energy NPSs. However, any*

emerging draft energy NPSs (or those amended but not having effect) are potentially capable of being important and relevant considerations in the decision-making process. The extent to which they are relevant is a matter for the relevant Secretary of State to consider within the framework of the Planning Act 2008 and with regard to the specific circumstances of each development consent order application'.

1.1.15 At the point of submission of the Project, the NPSs designated in January 2024 were government policy. If the revised NPSs are designated prior to a decision being made on the application for development consent, the Environmental Statement and Planning Statement will be reviewed for consistency with the newly designated NPSs, and any additional requirements would be captured within an errata document post submission. It was confirmed in Section 51 advice received from the Planning Inspectorate that if the new NPSs are adopted after the application has been submitted, the Examining Authority can issue procedural decisions to ask all parties for views on the impacts of new NPSs

1.1.16 The requirement to produce a Policy Compliance Document is set out in the Planning Inspectorates Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus (June 2025). This states that the Policy Compliance Document should include '*itemised evidence for how the policy requirements established within any relevant National Policy Statement(s)) and other important national and local policy documents are satisfied by the application. It should be approached section by section/requirement by requirement and outline the applicant's response with links to (a) evidence in the Environmental Statement, (b) the outcomes and (c) where they are secured'*.

1.1.17 This Policy Compliance Document is included in the application in compliance with Regulation 5(2)(q) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations') which requires '*any other documents considered necessary to support the application*'. This Policy Compliance Document provides an assessment of the Project's strategic alignment and conformity with both EN-1 and EN-5. The Accordance Table is set out as follows:

- The Project's conformity with EN-1 (Department for Energy Security and Net Zero, 2024a)
- The Project's conformity with EN-5 (Department for Energy Security and Net Zero, 2024b)
- The Project's conformity with EN-3 (Department for Energy Security and Net Zero, 2024c)
- How the Project is in general accordance with the National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government 2024), relevant local planning and neighbourhood plan policies.

1.1.18 Each relevant paragraph from EN-1 and EN-5 and EN-3 is set out with commentary as to the extent of compliance by the Project with its terms. The Policy Compliance Tables reference other relevant documentation submitted as part of the Application and provides a summary where appropriate.

1.1.19 The following documents have been used to inform the completion of this Policy Compliance Document:

- Draft Development Consent Order (document reference 3.1)
- Consultation Report (document references 5.1A and 5.1B) and appendices

- Habitats Regulations Assessment Report (document reference 5.3)
- Statement Relating to Statutory Nuisance (document reference 5.4)
- Planning Statement (document reference 5.6)
- National Landscapes – Duty to Seek to Further to Purposes Report (s85 Countryside and Rights of Way Act 2000) (document reference 5.10)
- Design Development Report (document reference 5.15)
- Environmental Statement (ES) (document references 6.1 to 6.18) and the Environmental Statement Non-Technical Summary (document reference 6.21)
- Biodiversity Net Gain Report (document reference 7.1)
- Outline Code of Construction Practice (document reference 7.2)
- Outline Landscape and Ecological Management Plan (document reference 7.4)
- Outline Public Rights of Way Management Plan (document reference 7.6)
- Flood Risk Assessment (document reference 7.9)
- Design and Access Statement (document reference 7.15)
- Design Approach to Site Specific Infrastructure (document reference 7.16)
- Strategic Options Back Check and Review (document reference 7.17)

Signposting for Compliance with EN-1 (Designated January 2024)

Table 1.1 Signposting for Compliance with EN-1

Paragraph No.	Policy Requirement	How the Project Meets the Policy
Chapter 1: Introduction		
1.1 Background		
1.1.2	It has effect for the decisions by the Secretary of State on applications for energy developments that are nationally significant under the Planning Act 2008. For such applications this NPS, combined with any technology specific energy NPS where relevant, provides the primary policy for decisions by the Secretary of State.	This accordance table and Chapter 8 of the Planning Statement (document reference 5.6) concludes compliance with NPS EN-1 and other relevant NPSs and demonstrate that the Project will not result in adverse impacts that outweigh its benefits. The extent and nature of the residual impacts do not trigger the exceptions set out in national planning policy to refuse consent with the presumption firmly engaged in favour of granting development consent Section 8.3 of the Planning Statement (document reference 5.6 establishes that the first three sub clauses in paragraph 1.14 are not triggered. Specifically: • there is no evidence to suggest that the granting of the DCO for the Project would lead to the UK being in breach of any of its international obligations; • there is no evidence to suggest that the granting of the DCO for the Project would lead the SoS to be in breach of any such duty; and • there is no evidence to suggest that the granting of the DCO for the Project would be unlawful by virtue of any enactment. In addition to this, there is no evidence to suggest that the granting of the DCO would be contrary to any regulations about how the Secretary of States decisions are to be taken.
1.1.4	The Planning Act 2008 also requires that, where an NPS has effect, the Secretary of State must decide an application for energy infrastructure in accordance with the relevant NPSs except to the extent the Secretary of State is satisfied that to do so would: • lead to the UK being in breach of its international obligations • be in breach of any statutory duty that applies to the Secretary of State • be unlawful • result in adverse impacts from the development outweighing the benefits • be contrary to regulations about how its decisions are to be taken	

Paragraph No.	Policy Requirement	How the Project Meets the Policy
Chapter 2: Government policy on energy and energy infrastructure development		
2.3 Meeting Net Zero		
2.3.3	Our objectives for the energy system are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050, including through delivery of our carbon budgets and Nationally Determined Contribution. This will require a step change in the decarbonisation of our energy system.	The Strategic Options Backcheck and Review (SOBR) (document reference 7.17) and the Planning Statement (document reference 5.6) explain that the Project is one of the essential network reinforcements needed to deliver the UK's net zero target. The reinforcement will also support security and reliability of supply, in accordance with Paragraph 2.3.3. Without reinforcement, the capacity of the existing network in East Anglia is insufficient to accommodate the connection of proposed new power sources connecting in the area. The Project would provide this reinforcement, helping to deliver 50 GW of offshore wind by 2030, and ultimately contributing towards achieving net zero.
2.3.4	Meeting these objectives necessitates a significant amount of new energy infrastructure, both large national significant developments and small-scale developments determined at a local scale. This includes the infrastructure needed to convert primary sources of energy (e.g. wind) into energy carriers (e.g. electricity or hydrogen), and to store and transport primary fuels and energy carriers into and around the country. It also includes the infrastructure needed to capture, transport and store carbon dioxide. The requirement for new energy infrastructure will present opportunities for the UK and contributes towards our ambition to support jobs in the UK's clean energy industry and local supply chains.	
2.3.5	The sources of energy we use are changing. Since the industrial revolution, our energy system has been dominated by fossil fuels. That remains the case today. Although representing a record low, fossil fuels still accounted for just over 76 per cent of energy supply in 2020. We need to dramatically increase the volume of energy supplied from low carbon sources.	

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2.3.6	We need to transform the energy system, tackling emissions while continuing to ensure secure and reliable supply, and affordable bills for households and businesses. This includes increasing our supply of clean energy from renewables, nuclear and hydrogen manufactured using low carbon processes (low carbon hydrogen), and, where we still emit carbon, developing the industry and infrastructure to capture, transport and store it.	
2.3.7	Decarbonisation means we are likely to become more dependent on some forms of energy compared to others. Using electrification to reduce emissions in large parts of transport, heating and industry could lead to more than half of final energy demand being met by electricity in 2050, up from 17 per cent in 2019, representing a doubling in demand for electricity.	This paragraph emphasises that, in addition to the need to decarbonise existing electricity supplies, a substantial increase (double by 2050) in the total electricity generated to enable decarbonisation across all sectors is needed. The Project is designed to support this increasing demand for electricity, as set out in the Strategic Options Backcheck and Review (SOBR) (document reference 7.17) and the Planning Statement (document reference 5.6)
2.6 Sustainable Development		
2.6.5	Whatever incentives, rules or other signals developers are responding to, the government believes that the NPSs set out planning policies which both respect the principles of sustainable development and can facilitate, for the foreseeable future, the consenting of energy infrastructure on the scale and of the kinds necessary to help us maintain safe, secure, affordable and low carbon supplies of energy.	The reinforcement provided by the Project will ensure we have sufficient infrastructure to support the transition to net zero and therefore the Project will support the climate change objectives of maintaining safe, secure, affordable and low carbon supplies of energy in accordance with Paragraph 2.6.5.
Chapter 3: The need for new nationally significant energy infrastructure projects		
3.1 Introduction		
3.1.1	This Part of the NPS explains why the government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and	National Grid notes that, in accordance with Paragraph 3.1.1, the need for infrastructure such as the Project is established, it

Paragraph No.	Policy Requirement	How the Project Meets the Policy
	why the government considers that the need for such infrastructure is urgent.	is urgent, and substantial weight should be given to this need when considering the application for development consent.
3.1.2	However, it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts. These effects will be minimised by the application of policy set out in Parts 4 and 5 of this NPS. See also Part 2 of each technology specific NPS.	It is recognised that there may be some significant residual impacts associated with large-scale energy infrastructure. The Application is accompanied by an Environmental Statement (ES) (document references 6.1 to 6.21) which provides the final assessment of the likely significant effects associated with the Project during its construction and operation. Chapter 8 of the Planning Statement (document reference 5.6) explains that in terms of the overall planning balance, the clear and substantial benefits of the Project clearly outweigh any adverse impacts. The presumption in favour of consent in NPS EN 1sets out that these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure and that any tests set out in the NPS or other planning policy are to be treated as if they have been met.
3.2 Secretary of State decision making		
3.2.6	The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure, which is urgent, as described for each of them in this Part.	In accordance with section 104 of the Planning Act 2008, the application will be determined in accordance with the NPS as primary policy for decision making and the NPS recognises that the need for the Project is demonstrated.
3.2.7	In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008.	
3.2.8	The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS.	

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3.3 The need for new nationally significant electricity infrastructure		
3.3.3	To ensure that there is sufficient electricity to meet demand, new electricity infrastructure will have to be built to replace output from retiring plants and to ensure we can meet increased demand. Our analysis suggests that even with major improvements in overall energy efficiency, and increased flexibility in the energy system, demand for electricity is likely to increase significantly over the coming years and could more than double by 2050 as large parts of transport, heating and industry decarbonise by switching from fossil fuels to low carbon electricity. The Impact Assessment for CB6 shows an illustrative range of 465-515TWh in 2035 and 610-800TWh in 2050.	Consistent with the Government's Net Zero target, there has been, and continues to be, growth in the volume of renewable and zero carbon generation that is seeking to connect to the electricity transmission system in the East Anglia and South East regions. UK Government policy clearly sets out the critical requirement for significant reinforcement of the transmission system to facilitate the connection of renewable energy sources and to transport electricity to where it is used. In particular, the British Energy Security Strategy (HM Government, 2022) sets targets for the connection of up to 50 GW of offshore wind by the 2030s as a key part of a strategy for secure, clean and affordable British energy for the long term. East Anglia's 400 kV electricity transmission network was built in the 1960s. It was built to supply regional demand, centred on Norwich and Ipswich. For many years, the only significant power stations generating in the East Anglia region were the Sizewell A and the Sizewell B nuclear power stations, Spalding North and Sutton Bridge gas fired power stations, and some further smaller 132 kV connected gas fired power stations. This generation capacity has recently been added to by several offshore windfarms with the existing generation totalling 6,552.4 MW of installed capacity. This is expected to grow substantially in coming years. In the East Anglia region, connection agreements have been signed for 26,919.9 MW of new generation (total generation of 33,472.3 MW minus existing generation of 6,552.4 MW). These future connection agreements comprise a large volume of offshore wind generation (including East Anglia Offshore Wind), gas-fired generation, energy storage projects, and a nuclear power station (at Sizewell C).
3.3.4	There are several different types of electricity infrastructure that are needed to deliver our energy objectives. Additional generating plants, electricity storage, interconnectors and electricity networks all have a role, but none of them will enable us to meet these objectives in isolation.	
3.3.16	If demand for electricity doubles by 2050, we will need a fourfold increase in low carbon generation and significant expansion of the networks that transport power to where it is needed. In addition, we committed in the Net Zero Strategy to take action so that by 2035, all our electricity will come from low carbon sources, subject to security of supply, whilst meeting a 40-60 per cent increase in electricity demand. This means that the majority of new generating capacity needs to be low carbon.	
3.3.35	In considering applications, applicants are expected to consider foreseeable future demand when considering	

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	the location and route of their investments. This may involve consenting offshore platforms, converter stations or substations which facilitate future coordination	The Project will make a significant contribution to this need and will reinforce the transmission system in East Anglia in order to meet current and future demand. Without reinforcement, the capacity of the existing network in East Anglia is insufficient to accommodate the connection of proposed new power sources connecting in the area. This reinforcement will ensure that, in accordance with national policies and targets, the Project will improve the existing electricity transmission network, and will contribute to energy independence, the UK's decarbonisation requirements and climate change targets, and assist in ensuring the supply of energy remains secure, reliable and affordable.
3.3.63	Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible	
3.3.65	There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives.	It is evident that the Project is seeking to respond to the urgent need for new electricity network infrastructure and the programme for the Project's delivery seeks to achieve this at pace, whilst ensuring all required obligations are met.
3.3.66	The security and reliability of the UK's current and future energy supply is very highly dependent on having an electricity network which will enable new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security. The delivery of this important infrastructure also needs to balance cost to consumers, accelerated timelines for delivery and the minimisation of community and environmental impacts.	The Strategic Options Backcheck and Review (SOBR) (document reference 7.17) and the Planning Statement (document reference 5.6) clearly set out the need for the Project.
3.3.67	The need to connect to new sources of electricity generation and new sources of demand is not the only driver for new electricity network infrastructure. As the electricity system grows in scale, dispersion, variety, and complexity, work will be needed to protect against	National Grid lies at the heart of a transforming energy system. National Grid plays a vital role in connecting millions of people to the energy they use, while continually seeking ways to make the energy system cleaner. National Grid owns and manages the national high-voltage electricity transmission system

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	the risk of large-scale supply interruptions in the absence of sufficiently robust electricity networks. While existing transmission and distribution networks must adapt and evolve to cope with this reality, development of new lines of 132kV (and over 2km) and above will also be necessary to preserve and guarantee the robust and reliable operation of the whole electricity system.	throughout England and Wales. National Grid owns, builds and maintains the infrastructure; overhead lines, buried cables and substations as a few examples, to allow power to move around the country. The key role of this transmission system is to connect the electricity generators' power stations with regional Distribution Network Operators (DNOs) who then supply businesses and homes. In return for the connection, users of the transmission network pay a tariff to National Grid. The Project forms a part of the Great Grid Upgrade, which is the largest overhaul of the electricity grid in generations.
3.3.68	The volume of onshore reinforcement works needed to meet decarbonisation targets is substantial. National Grid ESO forecasts that over the next decade the onshore and offshore transmission network, some of which is located offshore will require a doubling of north-south power transfer capacity due to increased wind generation in Scotland; substantial reinforcement in the Midlands to accommodate increased power flows from Scotland and the North of England; substantial reinforcement in London and the South of England to allow for Europe-bound export of excess wind generation from Scotland and the North of England, as well as the importation of energy from Europe to increase resilience during any periods which may be affected by intermittent energy generation mix and as part of the country's transition to increased energy security; and substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation (this may also require additional offshore connections coming to land in England).	National Grid notes that the Project intends to, in part, support the '*substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation (this may also require additional offshore connections coming to land in England)*', as per Paragraph 3.3.68.

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3.3.69	It is important to note that the crucial national benefits of increased system robustness through new electricity network infrastructure projects are shared by all users of the system.	National Grid shares in this ambition, and through its operations is central to achieving it.
3.3.70	As all new grid projects have a role in efficiently constructing, operating and connecting low carbon infrastructure to the National Electricity Grid, the scope of networks CNP infrastructure is not limited to those associated specifically with a particular project.	Noted, the Project is Critical National Priority, as established in paragraph 4.2.5 of NPS EN-1, and it supports a number of generation projects, such as the Five Estuaries and North Falls offshore wind farms (not one discrete project), being primarily a network reinforcement.
3.3.71	The historical approach to connecting offshore wind resulted in individual radial connections developed project-by-project. This may continue to be the most appropriate approach for some areas with single offshore wind projects that are not located in the vicinity of other offshore wind and / or offshore infrastructure that is planned or foreseen in the near future. For regions with multiple windfarms or offshore transmission projects it is expected that a more coordinated approach will be delivered. For these areas, this approach is likely to reduce the network infrastructure costs as well as the cumulative environmental impacts and impacts on coastal communities by installing a smaller number of larger connections, each taking power from multiple windfarms instead of individual point-to-point connections for each windfarm.	The Project facilitates a more coordinated approach to transmission as it seeks to connect generation and transmission projects in the North Sea and throughout East Anglia to the wider grid. For example, at the new EACN Substation, agreements are in place with two offshore wind farm projects and an interconnector for based on their connections into the new substation. See also the response to 3.3.70
3.3.72	Connecting the volume of offshore wind capacity targeted by the government will require not only new offshore transmission infrastructure but also reinforcement to the onshore transmission network, to accommodate the increased power flows to regional demand centres.	See response to 3.3.70.

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3.3.73	Due to the time required to plan, approve and construct the required new onshore transmission infrastructure, to date the completion of these onshore reinforcements has often taken longer than the completion of the offshore wind farms for which they are being built. This could present a material barrier to the delivery of UK Government ambition to deliver up to 50GW of offshore wind by 2030.	NESO's (2024b) Clean Power 2030 Report establishes that the Project is critical to achieving the Governments objective to have a clean power system by 2030. At present the Project has a delivery date after 2030 and, therefore, support is needed to bring the Project forward for 2030 delivery. See also the analysis against EN-1 paragraph 3.3.74 below.
3.3.74	The strategic approach to network planning, including the Holistic Network Design (HND) for onshore-offshore transmission, planned HND follow-on exercises and the proposed move to Centralised Strategic Network Planning for the onshore-offshore network, allows for clearer identification of needs and includes upfront consideration of environmental and community impacts. Government recognises the work undertaken in these strategic network planning exercises and these should be an important and relevant consideration in the consenting process. This recognition of the network designs seeks to directly support progress of projects identified within the designs as they are brought forward for consent. Further details are provided in Section 2.8 and 2.13 of EN-5.	The Project was part of the Offshore Transmission Network Review (OTNR) and Offshore Coordination Support Scheme (OCSS) studies. is not being submitted as part of larger, single application which incorporates the renewable energy projects which will connect into the electricity transmission network. These studies explored various opportunities to seek to improve the economic competitiveness and efficiencies that may be available through collaboration between projects. The OTNR has been progressed since its announcement in 2020. The review brought together key stakeholders involved in the timing, siting, design and delivery of offshore wind, to consider all aspects of the existing regime and how this influences the design and delivery of transmission infrastructure. The Five Estuaries and North Falls offshore wind farm projects engaged in the OTNR. In April 2022 the Government announced the OCSS which came as a result of the OTNR. The OCSS provided grant funding for projects to explore potential coordination options for offshore transmission infrastructure. The fund was available to those projects that were further developed than those eligible for the Holistic Network Design (HND). The HND provided a recommended offshore and onshore design for a 2030 electricity network which facilitated the government's ambition of 50GW of offshore wind by 2030. At that stage five projects, including the North Falls and Five Estuaries offshore wind

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		farms, Sea Link, EuroLink (now LionLink) and Nautilus committed to exploring coordinated network designs. Applications to the OCSS closed in February 2023 and a consortium of North Falls, Five Estuaries and Sea Link was successful in receiving grant funding. The consortium worked together to explore the potential options for coordination but notwithstanding the funding, ultimately the OCSS was not taken forward, following a government decision in September 2024. In April 2024, National Grid Electricity Transmission provided a response to the electricity system operators (ESO) East Anglian network study, which was part of the OTNR's initiative to explore coordinated offshore infrastructure. This response indicates NGETs engagement with the OTNRs findings and its consideration of these insights in planning and developing transmission projects. By integrating the OTNRs recommendations and collaborating with relevant stakeholders, National Grid aims to ensure that its projects contribute effectively to a coordinated and efficient electricity transmission network, facilitating the UK's transition to net zero emissions.
3.3.75	The final Phase 1 report for National Grid ESO's Offshore Coordination Project (published December 2020) found that a more integrated approach to offshore transmission, which included efficient planning of the onshore network, could deliver consumer benefits of up to £6 billion by 2050, depending on how quickly it could be implemented. It also found that the number of new electricity infrastructure assets, including cables and onshore landing points could be reduced by up to 50 per cent over the same period, significantly reducing environmental impacts and impacts on coastal communities.	Noted, the Project will achieve efficiencies through taking a coordinated approach to transmission as set out in the response to 3.3.70 and 3.3.71.

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3.3.78	Further to the needs case above, it is recognised that the case for a new connection or network reinforcement is demonstrated if the proposed development represents an efficient and economical means of: • connecting a new generating station or storage facility to the network • reinforcing the network to accommodate such connections, or • reinforcing the network to ensure that it is sufficiently resilient and capacious (per any performance standards set by Ofgem) to reliably supply present and/or anticipated future levels of demand. In considering the 'economic and efficient' approach the network project needs to follow good design, avoidance and mitigation principles (and/ or biodiversity compensation where needed for transmission in the marine environment), as referenced in EN-5.	The Project is Critical National Priority, and it supports a number of generations projects (not one discrete project), being primarily a network reinforcement. As such, the Project is considered to be a means of all of the following: • connecting a new generating station or storage facility to the network • reinforcing the network to accommodate such connections, and • reinforcing the network to ensure that it is sufficiently resilient and capacious Meanwhile, as well as a statutory duty to be economical and efficient, as a licence holder, National Grid has specific duties to uphold in relation to the desirability of preserving amenity of certain aspects of the environment and to mitigate the effects of its activities on the environment under Section 38 and Schedule 9 of the Electricity Act 1989. It is these key responsibilities and objectives which underpin National Grid's design principles on which the Project is based. At multiple stages of the options appraisal process, National Grid has carried out assessments which consider the efficiency and the economic benefits of the Project. This process is set out in the Strategic Options Backcheck and Review (SOBR) (document reference 7.17). This demonstrates that the Project is an efficient and economical means of reinforcing the network. The Application is accompanied by an ES (document references 6.1 to 6.21) which provides the final assessment of the likely significant effects, associated with the Project during its construction and operation, after the mitigation hierarchy has been applied.

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3.3.79	Moreover, given the crucial role of networks in connecting all of the other kinds of electricity infrastructure described above it is especially important that the Secretary of State considers network projects as elements of a coherent and strategically necessary system, whether or not they are linked together in specific NSIPs. For instance, when evaluating applications for new electricity networks infrastructure the Secretary of State should have regard to the fact that given, i) the government's strategic commitment to ambitious levels of interconnection capacity and offshore wind generation, and ii) the tightly interdependent infrastructure chain linking interconnection and offshore generation with onshore demand centres, delays in the approval of associated new network developments could cause significant economic waste and set back the strategically vital goals of decarbonisation and energy security.	Noted. Whilst the Project does not involve generation, it is intrinsically linked to the success of forthcoming generation projects, particularly in relation to offshore wind, and as set out in response to 3.3.70 and 3.3.71, the Project proposes a coordinated approach to electricity transmission. Therefore, the Project cannot be considered without taking account of the benefits in terms of facilitating grid capacity for new generation projects.
3.3.81	The importance of accelerating coordination does not, however, militate against the need for standalone electricity networks projects, and these projects are supported by this NPS and should continue to be assessed on their own merits.	Noted. There is evident need for the Project in its own right to increase transmission capacity and upgrade the grid in East Anglia.
4	**Assessment Principles**	
4.1	**General Policies and Considerations**	
4.1.2	The Energy White Paper and British Energy Security Strategy emphasises the importance of the government's net zero commitment and efforts to fight climate change, as well as the need to maintain a secure and reliable energy system. The Levelling Up	The Project, if granted development consent, would make an important contribution to reducing greenhouse gases and helping the UK reaching the Government's target of net zero by 2050, by supporting the distribution of greener energy.

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	White Paper calls on the Government to ensure investment in the transition to Net Zero benefits less well-performing parts of the UK, reducing emissions, facilitating economic development and the creation of jobs.	
4.1.3 – 4.1.4	Given the level and urgency of need for infrastructure of the types covered by the energy NPSs set out in Part 3 of this NPS, the Secretary of State will start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused. The presumption is also subject to the provisions of the Planning Act 2008 referred to paragraph 1.1.4 of this NPS.	Section 104(3) of the Planning Act 2008 sets out that that an application for development consent should be determined in accordance with the relevant NPS except where a limited number of circumstances would apply. It is not considered that any of these limited circumstances would apply, therefore the Application will be assessed against the relevant NPS, any Local Impact Report (As part of the Planning Act 2008 process, the relevant local authorities will be invited to submit a local impact report (LIR) giving details of the likely impact of the Project on the authority's area), and any other matters the SoS thinks are both important and relevant to the decision. The level and urgency of the need for the Project is set out in ES Chapter 3: Alternatives (document reference 6.3), Planning Statement (document reference 5.6) and Strategic Options Backcheck and Review (SOBR) (document reference 7.17). Given the Planning Act 2008 requirements set out in Section 104, and the clear statements in respect to a presumption in favour of such types of energy infrastructure as set out in EN-1; the need for the Project has been established.
	Weighing impacts and benefits	
4.1.5	In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account: • its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities,	The Application is accompanied by an Environmental Statement (ES) (document references 6.1 to 6.21) which provides the final assessment of the likely significant effects associated with the Project during its construction and operation. The Planning Statement (document reference 5.6) concludes that the clear and substantial benefits of the Project clearly outweigh any adverse impacts. The presumption in

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	environmental enhancements, and any long-term or wider benefits • its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy.	favour of consent in NPS EN 1 sets out that these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure and that any tests set out in the NPS or other planning policy are to be treated as if they have been met.
4.1.6	In this context, the Secretary of State should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels. These may be identified in this NPS, the relevant technology specific NPS, in the application or elsewhere (including in local impact reports, marine plans, and other material considerations as outlined in Section 1.1).	The environmental, social and economic benefits of the Project are set out in Chapter 3 of the Planning Statement. An assessment of the Project against NPS is set out in Chapter 7 of the Planning Statement (document reference 5.6). These take into account of impacts and benefits at national, regional and local levels. The benefits of the Project are weighed against its adverse impacts in the Planning Balance in Chapter 8 of the Planning Statement (see above in relation to EN-1, 4.1.5).
4.1.7	Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the Secretary of State considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development. For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an	The Norwich to Tilbury Project is a proposal by National Grid to reinforce the high voltage power network in East Anglia. The reinforcement is needed because the existing transmission network, even with current upgrading, will not have sufficient capacity for the new renewable energy (a substantial proportion of which is generated by offshore wind) that is expected to connect to the network over the next ten years and beyond. Completion of the Project, together with other new reinforcements across the country will meet this future energy transmission demand both in East Anglia and across the UK. The Planning Statement (document reference 5.6) explains that the Project is Critical National Priority Infrastructure as defined in National Policy Statement EN-1. Without reinforcement, the capacity of the existing network in East Anglia and the Southeast is insufficient to accommodate the connection of proposed new power sources connecting in the

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	unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.	area. As such, the Project is considered to be a means of all of the following: • Connecting a new generating station or storage facility to the network • Reinforcing the network to accommodate such connections, and • Reinforcing the network to ensure that it is sufficiently resilient and capacious. In line with Paragraph 4.1.7 where a project qualifies as CNP infrastructure the need case for the project will likely outweigh residual effects, unless the residual effects present an unacceptable risk to, or interference with the listed matters. The ES (Volume 6 of the DCO application) and the Planning Statement (document reference 5.6) conclude that the Project will not result in residual impacts which present an unacceptable risk to the matters listed in the policy.
	Other documents	
4.1.10 – 4.1.15	The policy set out in this NPS and the technology specific energy NPSs is intended to provide greater clarity around existing policy and practice of the Secretary of State in considering applications for nationally significant energy infrastructure, (or therefore the “benchmark” for what is, or is not, an acceptable nationally significant energy development). The energy NPSs have taken account of the National Planning Policy Framework (NPPF), the Planning Practice Guidance for England, and Planning Policy Wales and Technical Advice Notes (TANs) for Wales, where appropriate. Other matters that the Secretary of State may consider both important and relevant to their decision-making	National Grid has identified Development Plan policies that may be considered to be important or relevant by the SoS. Policies relevant to the assessments contained in the ES are referred to in ES Chapter 2: Key Legislation and Planning Policy Context (document reference 6.2) An assessment of relevant policies is contained within this Policy Compliance Document.

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	may include Development Plan documents or other documents in the Local Development Framework. Where the project conflicts with a proposal in a draft Development Plan, the Secretary of State should take account of the stage which the Development Plan document in England or Local Development Plan in Wales has reached in deciding what weight to give to the plan for the purposes of determining the planning significance of what is replaced, prevented, or precluded. The closer the Development Plan document in England or Local Development Plan in Wales is to being adopted by the LPA, the greater weight which can be attached to it. In the event of a conflict between these documents and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure.	
	Development consent	
4.1.16 – 4.1.17	The Secretary of State should only impose requirements in relation to a development consent that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects. The Secretary of State should consider the guidance in the NPPF, the Planning Practice Guidance: Use of Planning Conditions, and TANs, or any successor documents, where appropriate.	The application for development consent for the Project is accompanied by a draft Development Consent Order (draft DCO) (document reference 3.1) and an Explanatory Memorandum (document reference 3.2). The draft DCO, while may be subject to amendments throughout the examination, sets out the requirements in respect to the construction, operation and maintenance of the Project. The Requirements and their suggested reason for imposition are also explained in the Explanatory Memorandum document. The proposed Requirements have been considered against the tests for planning conditions (necessary; relevant to planning; relevant to the development to be permitted; enforceable;

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		precise; and reasonable in all other respects) as set out in Paragraph 57 of the NPPF.
4.1.18	The Secretary of State may consider any development consent obligations that an applicant agrees with local authorities. These must be 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.	National Grid's commitment to providing 10% BNG will be secured through a unilateral undertaking given under s.106 of the Town and Country Planning Act 1990. While every effort has been made to deliver the required BNG through replacement planting and on-site mitigation in the form of habitat creation and enhancement, given the scale and nature of the Project, 10 % BNG is not fully achievable on-site. Off-site BNG is therefore proposed to make up any deficit. Biodiversity is not physically bound by planning authority boundaries and therefore a holistic approach is proposed for any off-site BNG, with the aim to deliver a biodiversity legacy ideally in each of the three counties crossed by the Project (Norfolk, Suffolk and Essex). Offsite BNG will be delivered through collaboration with partners and purchased from commercially registered providers. National Grid has been engaging in productive discussions with Norfolk, Suffolk and Essex Wildlife Trusts regarding the provision of off-site BNG units for the Project. National Grid has prepared draft Heads of Terms in relation to s106 Unilateral Undertaking.
	Early engagement	
4.1.19 - 4.1.20	Early engagement both before and at the formal pre-application stage between the applicant and key stakeholders, including public regulators, Statutory Consultees (including Statutory Nature Conservation Bodies (SNCBs)), and those likely to have an interest in a proposed energy infrastructure application, is strongly encouraged in line with the Government's pre-application guidance. This means that only applications which are fully prepared and comprehensive can be	The Consultation Report (document reference 5.1) provides a complete overview of the consultation and stakeholder engagement activities on the Project and explains how National Grid has had regard to the statutory guidance about the pre-application procedure pursuant to Section 50 of the Planning Act 2008. National Grid has undertaken a number of environmental and thematic meetings with relevant stakeholders to gather information about the baseline environment, scope of the

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	accepted for examination, enabling them to be properly assessed by the Examining Authority and leading to a clear recommendation report to the Secretary of State. This is particularly so in the case of HRA matters covered in paragraphs 5.4.25 to 5.4.31 below, which explain the onus is on the applicant to submit sufficient information to enable the Secretary of State to conduct an Appropriate Assessment if required.	assessment and potential effects and mitigation. These have included the following thematic meetings for the following topics: • Landscape and Visual Thematic Meetings: involving the relevant planning authorities, Dedham Vale National Landscape and Natural England. • Biodiversity Thematic Meetings: involving the relevant planning authorities, Natural England, Norfolk, Suffolk and Essex Wildlife Trusts and the RSPB; • Historic Environment Thematic Meetings: involving the relevant planning authorities and Historic England; and • Traffic and Transport Thematic Meetings: involving the relevant planning authorities and National Highways. An overview of this engagement and how this has informed the development of the Project is provided in the Consultation Report (document reference 5.1).
	Financial and technical viability	
4.1.21 – 4.1.22	In deciding to bring forward a proposal for infrastructure development, the applicant will have made a judgement on the financial and technical viability of the proposed development, within the market framework and taking account of government interventions. Where the Secretary of State considers that the financial viability and technical feasibility of the proposal has been properly assessed by the applicant, it is unlikely to be of relevance in Secretary of State decision making (any exceptions to this principle are dealt with where they arise in this or other energy NPSs and the reasons why financial viability or technical feasibility is likely to be of relevance explained).	At multiple stages of the options appraisal process, National Grid has carried out assessments on the financial and technical viability of the Project (see the Strategic Options Backcheck and Review (SOBR) (document reference 7.17) for further details). The Funding Statement (document reference 4.2) explains how the acquisition of the land necessary to build the Project would be funded as well as how the Project generally is to be funded.

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4.2	**The critical national priority for low carbon infrastructure**	
4.2.5	This does not extend the definition of what counts as nationally significant infrastructure: the scope remains as set out in the Planning Act 2008. Low carbon infrastructure for the purposes of this policy means: • for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those associated specifically with a particular generation technology, as all new grid Projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System	The Project is identified a National Significant Infrastructure Project (in accordance with Part 3, Section 14(1)(b) and Section 16(1)(a) of the Planning Act 2008). The Project is Critical National Priority Infrastructure being electricity grid infrastructure within the scope of CNP as set out in paragraph 4.2.5.
4.2.6 - 4.2.7	The overarching need case for each type of energy infrastructure and the substantial weight which should be given to this need in assessing applications, as set out in paragraphs 3.2.6 to 3.2.8 of EN-1, is the starting point for all assessments of energy infrastructure applications. The CNP policy does not create an additional or cumulative need case or weighting to that which is already outlined for each type of energy infrastructure. The policy applies following the normal consideration of the need case, the impacts of the Project, and the application of the mitigation hierarchy. As such, it is relevant during Secretary of State decision making and specifically in reference to any residual impacts that have been identified. It should therefore also be given consideration by the Examining Authority when it is making its recommendation to the Secretary of State.	The Project is Critical National Policy and the presumption is engaged. The Project has been designed following the mitigation hierarchy. At the routeing and siting stage, the Project design process was informed by the Holford and Horlock Rules to avoid impacts where possible. These established guidelines informed the evaluation criteria and how the mitigation hierarchy was applied during the options selection process. The mitigation hierarchy is a key component of the Environmental Impact Assessment Process. ES Chapter 5: EIA Approach and Method (document reference 6.5) describes the mitigation hierarchy as a stepped process that helps development projects to address potentially adverse impacts on the environment. The adopted design approach is set out within ES Chapter 3: Alternatives (document reference 6.3) which describes the evolution of the Project from Strategic Options through to the

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		selection of the alignment and the technology choice submitted within the application for development consent. The ES (document reference 6.1 to 6.21), Design Development Report (document reference 5.15) and the Planning Statement (document reference 5.6), Design and Access Statement (document reference 7.15) and Design Approach to Site Specific Infrastructure (document reference 7.17) demonstrate that the mitigation hierarchy has been applied throughout the design and development of the Project. Chapter 8 of the Planning Statement (document reference 5.6) presents the planning balance explaining the weight given to the adverse impacts of the Project and its benefits and the application of the CNP related policies to the Project.
4.2.8	During decision making, the CNP policy will influence how non-HRA and non-MCZ residual impacts are considered in the planning balance. The policy will therefore also influence how the Secretary of State considers whether tests requiring clear outweighing of harm, exceptionality, or very special circumstances have been met by a CNP Infrastructure application. Further detail is provided in paragraphs 4.2.15 to 4.2.17, and Figure 2.	To support the SoS with its duties under the Conservation of Habitats and Species Regulations 2017 (as amended) and in accordance with planning policy, a Habitats Regulations Assessment (HRA) Report has been prepared (document reference 5.3). It forms part of the application for a Development Consent Order (DCO) for the Project submitted to the Secretary of State for Department for Energy Security and Net Zero (the 'Secretary of State'), under Section 37 of The PA 2008 and is submitted to inform the Secretary of State's HRA of the Project. The DCO application demonstrates that the Project does not result in any HRA or MCZ residual impacts. Therefore, there is no need for the SoS to consider making a derogation under the Habitats Regulations and the presumption of consent for CNP infrastructure still stands.
	Applicant's assessment	
4.2.10	Applicants for CNP infrastructure must continue to show how their application meets the requirements in this NPS and the relevant technology specific NPS, applying	The Planning Statement (document reference 5.6) sets out how the Application meets the requirements of the designated NPS (EN-1, EN-3 and EN-5), whilst the ES (document

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	the mitigation hierarchy, as well as any other legal and regulatory requirements.	references 6.1 to 6.21) assesses the potential environmental impacts of the Project. The ES (document references 6.1 to 6.21) demonstrates that the mitigation hierarchy has been applied throughout the design and development of the Project. The Design Development Report (document reference 5.15), ES Chapter 3: Alternatives (document reference 6.3), Design and Access Statement (document reference 7.15) and Design Approach for Site Specific Infrastructure (document reference 7.16) provide an overview of the design rationale for the Project. It outlines how the design choices have sought to reduce the environmental effects of the Project and demonstrates that the design has incorporated mitigation measures in order to avoid or reduce significant environmental effects wherever practicable. The Design Development Report (document reference 5.15) also explains the changes that were made to the Project as a result of feedback from the consultation process. The process of reviewing and responding to consultation feedback is explained in the Consultation Report (document reference 5.1). This includes engagement with Natural England which was undertaken during the statutory consultation and following this with several meetings being held. In line with national policy requirements, the Project has been designed following the mitigation hierarchy and has avoided impacts where possible through the routeing and siting process. Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features as far as reasonably practicable. National Grid has embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation

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		(and maintenance) of the Project. Embedded measures are those that are intrinsic to and built into the design of the Project. The Outline Code of Construction Practice (CoCP) (document reference 7.2) details the embedded measures and additional mitigation measures that have been identified through the Environmental Impact Assessment to avoid or reduce likely significant environmental effects. The Outline CoCP (document reference 7.2) as secured by Requirement 6 of Schedule 3 of the draft DCO (document reference 3.1), records all the commitments made by National Grid during the iterative development of the designs of the Project.
4.2.11	Applicants must apply the mitigation hierarchy and demonstrate that it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated.	See response to 4.2.10. Statements of Common Ground (SoCG) have been prepared with Natural England (document reference 5.9.13) as the SNCB. Other SoCG relevant to this policy include: • Environment Agency (document reference 5.9.15) • Norfolk Wildlife Trust (document reference 5.9.17) • Suffolk Wildlife Trust (document reference 5.9.18) • Essex Wildlife Trust (document reference 5.9.19)
4.2.12	Applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success, and that action is taken. Changes to measures may be needed e.g. adaptive management. The cumulative impacts of multiple developments with residual impacts should also be considered.	A list of all mitigation measures to be implemented throughout construction and operation phases with information on how these will be monitored is set out in Table 6.1 of the Outline CoCP (document reference 7.2). Chapter 6 of the Outline CoCP discusses the potential effects, mitigation measures, environmental commitments and monitoring relating to each of the ES topics and notes the topic specific documents where these matters are discussed in more detail. Section 7.2 of the Outline CoCP details how measures will be reported on.

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		National Grid's approach to compensation is set out in Chapter 7 of the Planning Statement.
4.2.13	Where residual impacts relate to HRA or MCZ sites then the Applicant must provide a derogation case, if required, in the normal way in compliance with the relevant legislation and guidance.	A Habitats Regulations Assessment Report (document reference 5.3) has been prepared. The Project does not result in any HRA residual impacts. Therefore, there is no need for the SoS to consider making a derogation under the Habitats Regulations and the presumption of consent for CNP infrastructure still stands.
	Secretary of State decision making	
4.2.14	The Secretary of State will continue to consider the impacts and benefits of all CNP Infrastructure applications on a case-by-case basis. The Secretary of State must be satisfied that the applicant's assessment demonstrates that the requirements set out above have been met. Where the Secretary of State is satisfied that they have been met the CNP presumptions set out below apply.	National Grid is satisfied that that the requirements have been clearly met and the CNP presumptions therefore apply. The basis to this is set out in the Planning Statement (document reference 5.6).
	Non-HRA and non-MCZ residual impacts of CNP Infrastructure	
4.2.15	Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts. The exception to this presumption of consent are residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or	The Planning Statement (document reference 5.6) sets out that the Project is CNP Infrastructure. The Planning Statement (document reference 5.6) demonstrates through cross reference to ES Chapter 10: Health and Wellbeing (document reference 6.10), ES Chapter 10: Contaminated Land, Geology and Hydrogeology (document reference 6.9) and ES Appendices 6.9.A1: Baseline Information and Preliminary Contaminated Land Risk Assessment (document reference 6.9.A1), Groundwater Baseline and Qualitative Groundwater Risk Assessment (document reference 6.9.A3), Traffic and Transport Construction Effects (document reference 6.16.A4), Flood Risk Assessment (document reference 7.9), Outline Construction

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	unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.	Traffic Management Plan (document reference 7.3). Electric and Magnetic Field Compliance Report (document reference 7.8) and the Statement of Statutory Nuisance (document reference 5.4) that the Project will not present an unacceptable risk to, or unacceptable interference with human health and public safety. The Planning Statement (document reference 5.6) with reference to ES Appendix 6.15: Summary of Aviation Impact (document reference 6.15.A2) that the Project will not present an unacceptable risk to defence. The Ancient Woodland and Veteran Tree Strategy (document reference 7.4.B) outlines the principal measures that are required to help avoid, minimise, and compensate for the potential ecological effects of the Project on ancient woodland and veteran trees, during and post construction, as per the mitigation hierarchy. Specific Project commitments have been made as standard mitigation, to remove impacts to ancient woodlands. No works will be undertaken (in line with Project commitments B20-B24 set out within the Outline CoCP (document reference 7.2)) within or within 15 m of these ancient woodlands. Impacts have also been reduced at one ancient woodland (Rivenhall Thicks) by Project commitment B25, set out within the Outline CoCP (document reference 7.2). A total of 112 trees and four groups have been surveyed within the Project Study Area as veterans. Four individual veteran trees require removal, while 15 veteran trees and two veteran groups require crown management. Complete removal of impacts to the four ancient woodlands and Rivenhall Thicks (and the associated 15 m buffer) are unavoidable, as the proposed works relate to the removal, undergrounding or modification of existing third-party infrastructure (11 kV, 33 kV, 132 kV), with the existing assets
4.2.16	As a result, the Secretary of State will take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.	
4.2.17	This means that the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests: • where development within a Green Belt requires very special circumstances to justify development; • where development within or outside a Site of Special Scientific Interest (SSSI) requires the benefits (including need) of the development in the location proposed to clearly outweigh both the likely impact on features of the site that make it a SSSI, and any broader impacts on the national network of SSSIs. • where development in nationally designated landscapes requires exceptional circumstances to be demonstrated; and • where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.	

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		already located within the associated woodland or 15 m root protection area. With regard to Net Zero, it is considered that the Project makes a significant contribution to Net Zero by providing significant reinforcements to the transmission system which will facilitate the connection of future sources of renewable and low carbon power generation along the coast and therefore will facilitate the achievement of Net Zero The Project therefore does not present a risk to the achievement of Net Zero. A FRA Flood Risk Assessment (FRA) (document reference 7.9) has been submitted as part of the application for development consent focussing on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. The Project does not present an unacceptable risk to, or unacceptable interference to flood risk. Paragraph 4.2.17 includes a non-exhaustive list of such tests. Section 7 of the Planning Statement sets out how the Project has met these tests. The Project does include proposals for development within the Metropolitan Green Belt. The works include an overhead line comprising standard and low height pylons, a new Tilbury North Substation and new Cable Sealing End (CSE) compounds. As outlined in Chapter 7 of the Planning Statement (document reference 5.6), National Grid deems that the proposed overhead line comprises an engineering operation and should therefore not be regarded as inappropriate development in the Green Belt. It is National Grid's position that the proposed Tilbury North Substation and CSE compounds may be considered to be inappropriate development in the Green Belt. The Planning Statement (document reference 5.6) sets out the very special circumstances to justify this development in the Green Belt.

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		Through careful routeing and siting the Project avoids all direct impacts on Sites of Special Scientific Interest. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) identifies and considers the impact of the Project on SSSIs. Following the application of mitigation set out in the Outline CoCP (document reference 7.2) it is concluded that there would be no significant residual effect on Flordon Common SSSI. No potential for adverse effects on other SSSI is expected. A Habitats Regulations Assessment Report (document reference 5.3) has been prepared. The Project does not result in any HRA or MCZ residual impacts. Therefore, there is no need for the SoS to consider making a derogation under the Habitats Regulations and the presumption of consent for CNP infrastructure still stands. The Project is routed through the Dedham Vale National Landscape, utilising underground cable technology. Paragraphs 4.2.17 and 5.10.32 in NPS EN-1 confirm that development consent in nationally designated landscapes can only be granted in exceptional circumstances and should be demonstrated to be in the public interest. Paragraph 5.10.33 of NPS EN-1 confirms that the SoS should ensure that any Projects consented in these designated areas should be carried out to high environmental standards. The Project meets the tests set out in Paragraph 5.10.32, as discussed below: The need for the development is set out in the Strategic Options Backcheck and Review (document reference 7.17) and Planning Statement (document reference 5.6) which explains how the Project will reinforce the transmission network in East Anglia. The need for which is already stated in Paragraph 3.3.68 of NPS EN-1. The cost of, and scope for, developing outside the National Landscape or meeting the need in some other way has been considered as part of the evolution of the Project.

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		ES Chapter 3: Alternatives (document reference 6.3) describes the routeing decision made by National Grid to route directly through the Dedham Vale National Landscape (using underground cables) or take a longer route around it. The direct route with underground cables was selected as it halves the connection length, avoids creating a third connection between Bramford and Twinstead, and better complies with the Holford Rules, despite requiring underground cable mitigation through the National Landscape And permanent detrimental effect on the environment, the landscape and recreational opportunities within the National Landscape have been avoided through undergrounding and careful consideration of routeing and siting through the National Landscape. On the basis of the above, exceptional circumstances therefore exist to justify the proposed development in the Dedham Vale National Landscape. As demonstrated by the needs case, the Project would be in the public interest. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on cultural heritage and archaeology assets. The Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 which take as a starting point that CNP infrastructure will be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Based on the above, it is established that in the case of the Project,

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		that any tests which require a clear outweighing or harm, exceptionally or in very special circumstances have been met. National Grid has set out in Chapter 8 of the Planning Statement (document reference 5.6) that the benefits of the Project clearly and demonstrably outweigh residual adverse effects after the implementation of mitigation measures. The Project is in accordance with the Energy NPSs and the CNP presumption of consent is firmly engaged.
	HRA derogations and MCZ assessments for CNP Infrastructure	
4.2.18	Any HRA or MCZ residual impacts will continue to be considered under the framework set out in the Habitats Regulations and the Marine and Coastal Access Act 2009 respectively.	To support the SoS with its duties under the Conservation of Habitats and Species Regulations 2017 (as amended) and in accordance with planning policy, a Habitats Regulations Assessment (HRA) Report has been prepared (document reference 5.3). The HRA comprises Stage 1: Screening and Stage 2: Appropriate Assessment. It builds on the Draft HRA Screening Report has concluded that there will be not significant adverse effects of the integrity of a European Site (following the implementation of mitigation). There were 28 European Sites identified within the Study Area for the HRA Report. No likely significant effects were identified for 23 sites which were screened out at the pre-screening stage. Five sites were taken forward for detailed screening, no likely significant effects were identified for the Thames Estuary and Marshes SPA and Ramsar Site. Stage 1 of the HRA process identified the potential for Likely Significant Effects (on its own or in-combination effects with other plans or projects) on three European sites: • Norfolk Valley Fens SAC • Stour and Orwell Estuaries Ramsar Site • Stour and Orwell Estuaries SPA.
4.2.19	Where, following Appropriate Assessment, CNP Infrastructure has residual adverse impacts on the integrity of sites forming part of the UK national site network, either alone or in combination with other plans or Projects, the Secretary of State will consider making a derogation under the Habitats Regulations.	
4.2.21	For both derogations, the Secretary of State will consider the particular circumstances of any plan or Project, but starting from the position that energy security and decarbonising the power sector to combat climate change: • requires a significant number of deliverable locations for CNP Infrastructure and for each location to maximise its capacity. This NPS imposes no limit on the number of CNP infrastructure Projects that may be consented. Therefore, the fact that there are other potential plans or Projects deliverable in different locations to meet the need for CNP Infrastructure is unlikely to be treated as an	

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	alternative solution. Further, the existence of another way of developing the proposed plan or Project which results in a significantly lower generation capacity is unlikely to meet the objectives and therefore be treated as an alternative solution; and • are capable of amounting to imperative reasons of overriding public interest (IROPI) for HRAs, and, for MCZ assessments, the benefit to the public is capable of outweighing the risk of environmental damage, for CNP Infrastructure	The potential LSEs relate to construction activities. All operation (and maintenance) LSEs have been screened out. In the absence of mitigation, direct LSEs through changes in hydrology could not be screened out for the Norfolk Valley Fens SAC or the Stour and Orwell Estuaries SPA and Ramsar Site. In the absence of mitigation, indirect LSEs through temporary land loss, fragmentation of habitat, disturbance (through noise, vibration, light and movement), changes in air quality and changes in hydrology could not be screened out at FLL for the waterbird assemblage qualifying feature of the Stour and Orwell Estuaries SPA and Ramsar Site. Two areas of FLL are present within the Order Limits, which have been used by significant numbers of roosting Lapwing and Golden Plover which are part of the waterbird assemblage of the Stour and Orwell Estuaries SPA and Ramsar Site. In the absence of mitigation, LSEs through temporary land loss, fragmentation of habitat, disturbance (through noise, vibration, light and movement) and changes in air quality could not be screened out for the waterbird assemblage qualifying feature of the Stour and Orwell Estuaries SPA and Ramsar Site. This is due to the presence of two areas of FLL within the Order Limits, which have been used by significant numbers of roosting lapwing and golden plover which are part of the waterbird assemblage of the Stour and Orwell Estuaries SPA and Ramsar Site. The Appropriate Assessment concluded there would be no adverse effects on the integrity of the Norfolk Valley Fens SAC and the Stour and Orwell Estuaries SPA and Ramsar Site with regard to hydrology once mitigation measures within the Outline CoCP (document reference 7.2), secured through Requirement 4 of the draft DCO (document reference 3.1) are implemented. This includes direct and indirect (through FLL)
4.2.22	For HRAs, where an applicant has shown there are no deliverable alternative solutions, and that there are IROPI, compensatory measures must be secured by the Secretary of State as the competent authority, to offset the adverse effects to site integrity as part of a derogation. For MCZs, where an applicant has shown there are no other means of proceeding which would create a substantially lower risk, and the benefit to the public outweighs the risk of damage to the environment, the Secretary of State must be satisfied that measures of equivalent environmental benefit will be undertaken.	

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		effects at the Stour and Orwell Estuaries SPA and Ramsar Site. The Appropriate Assessment concluded there would be no adverse effects on the integrity of the Stour and Orwell Estuaries SPA and Ramsar Site with regard to air quality on FLL associated with the waterbird assemblage qualifying feature. This is primarily due to the FLL consisting of arable habitat which is not considered to be vulnerable to effects air quality effects. Furthermore, the Outline Dust Management Plan, appended to the Outline CoCP (document reference 7.2), secured through Requirement 4 of the draft DCO (document reference 3.1) will be adhered to during the works.
4.3	**Environmental Effects/Considerations**	
4.3.1 – 4.3.3	All proposals for projects that are subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project. The Regulations specifically refer to effects on population, human health, biodiversity, land, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them. The Regulations require an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects.	The application for development consent is accompanied by an ES which meets the requirements of EN-1 and EN-5. ES Appendix 5.2: Scope of the Assessment (document reference 6.5.A2) outlines the scope of the assessment. This has been informed by the Scoping Opinion (document reference 6.20).

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4.3.4	To consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. This information could include matters such as employment, equality, biodiversity net gain, community cohesion, health and well-being.	The ES provides an assessment of likely significant environmental, social and economic effects arising during construction and operation of the Project. EIA Measures The development of measures to avoid, reduce or compensate for any significant adverse effects of a Project is an intrinsic part of the EIA process and, from the outset, the route selection process described in ES Chapter 3: Alternatives (document reference 6.3) sought to take into account environmental constraints and to avoid them as far as possible. Generally, there are three types of design measures implemented on the Project; embedded, good practice and mitigation. Embedded measures: Embedded measures are those that are intrinsic to and built into the design of the Project. Table 4.2 of ES Chapter 4: Project Description (document reference 6.4) outlines the key embedded measures that have been incorporated into the design to date. Standard Mitigation Measures: National Grid has identified a number of good practice measures, which generally comprise measures imposed through legislative requirements or represent standard sector good practices. These include measures to reduce nuisance from construction activities. The good practice measures are set out in the Outline CoCP (document reference 7.2) Additional Mitigation measures and Biodiversity Net Gain: National Grid will deliver net gain by at least 10% or greater in environmental value, including BNG, on this Project. Further details can be found in the Biodiversity Net Gain Report (document reference 7.1). The ES has identified locations where additional mitigation is proposed to avoid or reduce likely significant effects following

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		the assessment undertaken in each of the topic chapters. The Environment Act 2021 includes a requirement for Nationally Significant Infrastructure Projects (NSIPs) to deliver at least 10% biodiversity net gain from November 2025. As addressed below NPS EN-1 also states that '*Although achieving biodiversity net gain is not an obligation on applicants, Schedule 15 of the Environment Act 2021 contains provisions which, when commenced, mean the Secretary of State may not grant an application for a Development Consent Order unless satisfied that a biodiversity gain objective is met in relation to the onshore development in England to which the application relates*' (Paragraph 4.6.1).
4.3.5	For the purposes of this NPS and the technology specific NPSs the ES should cover the environmental, social and economic effects arising from pre-construction, construction, operation and decommissioning of the project.	The ES provides an assessment of likely significant environmental effects arising during construction and operation of the Project. ES Chapter 15: Socio-economics, Recreation and Tourism (document reference 6.15) presents the existing socio-economic conditions in the Local, 3 km and Wider Study Areas surrounding the Project. The Planning Statement Chapter 7 (document reference 5.6) provides an assessment of the environmental, social and economic impacts of the Project from a planning perspective.
4.3.9	As in any planning case, the relevance or otherwise to the decision-making process of the existence (or alleged existence) of alternatives to the proposed development is, in the first instance, a matter of law. This NPS does not contain any general requirement to consider alternatives or to establish whether the Project represents the best option from a policy perspective. Although there are specific requirements in relation to compulsory acquisition and habitats sites, the NPS does not change requirements in relation to compulsory acquisition and habitats sites.	National Grid undertakes an options appraisal on each new Project. Options appraisal is a robust and transparent process that is used to compare options and to assess the positive and negative effects they may have, across a wide range of criteria including environmental, socio-economic, technical and cost factors. The assessment is documented to provide in a transparent manner, the information on which decisions are based. This is reported in the Strategic Options Backcheck and Review Report (document reference 7.17). Consultation with the relevant stakeholders and community have been carried out to inform the selection of the preferred options. ES Chapter 3: Alternatives (document reference 6.3) and The Design and

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		Access Statement (document reference 7.15) sets out how the Project has evolved from a concept, through strategic options, route corridors and indicative alignments to the Project presented within the application for development consent. The Design Development Report (document reference 5.15) describes how the Project design has developed between Statutory Consultation and submission.
	Applicant assessment	
4.3.10	The applicant must provide information proportionate to the scale of the Project, ensuring the information is sufficient to meet the requirements of the EIA Regulations.	The Application is proportionate to the scale of the Project with regards to the requirements set out in the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations'). The Project constitutes Environmental Impact Assessment (EIA) development as defined in the EIA Regulations. The Project falls within Schedule 1 Paragraph 20 of the EIA Regulations, '*Construction of overhead electrical power lines with a voltage of 220 kV or more and a length of more than 15 km*'. A Scoping Report (document reference 6.19) was submitted to the Planning Inspectorate on 4 November 2022. This set out the parameters of the Project, the proposed methodology for undertaking the environmental assessment and the proposed scope of the EIA. It also identified the potentially significant environmental effects (as identified at that time) that would be assessed in more detail (i.e. scoped into the assessment), as well as those that were unlikely to be significant and could therefore be scoped out of the assessment. Further details on the EIA process and methodology can be found in ES Chapter 5: EIA Approach and Method (document reference 6.5).
4.3.11	In some instances, it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail.	ES Chapter 3: Alternatives (document reference 6.3) explains that the assessment of likely significant effects in this ES (Volume 6 of the DCO application) is based on the description

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	Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case.	of the design, construction, and operation (and maintenance) of the Project presented in this chapter and on Figure 4.1: Proposed Project Design (document reference 6.4.F1) and Figure 4.2: Proposed Project Design – Permanent Features (document reference 6.4.F2). Consideration has also been given to the potential for variation in the description of individual components of the Project. The environmental topic chapters consider sensitivity testing / flexibility in design that may be adopted to see if there would be new or different significant effects. Sensitivity testing / flexibility in design is assessed within Section 9 of each environmental topic chapter (Chapters 6 to 16 (documents references 6.6 to 6.16)) and includes: Flexibility in construction programme: • Assessment of an alternative delays to the construction schedule: Each environmental topic chapter provides an assessment to determine if the environmental effects would be different if the construction programme was delayed Flexibility in Design: • Flexibility within the Limits of Deviation (LoD), for example changes to the location or height of permanent features, such as pylons, within the LoD (other than where locations of pylons are committed to which isas detailed within the Outline CoCP (document reference 7.2)) • Flexibility within Order Limits, for example there are elements of the Project where uncertainty remains and a design flexibility alternative has been identified. To assess the potential effects of these elements, a single scenario is assessed within Section 7 with an assessment of the flexibility an alternative design scenario presented in Section 9 of each environmental topic chapter. Further detail is presented in Table 4.4 as to how each element has

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		been assessed within the ES (Volume 6 of the DCO application). The Order Limits include the LoD, which represent the maximum deviation for permanent infrastructure, such as the overhead line, pylons and underground cable and are shown on the Work Plans (document reference 2.3). The assessment presented within the ES is based on the 'Proposed Alignment', which is shown in ES Figure 4.1: Proposed Project Design (document reference 6.4.F1). The LoD allow for adjustment to the final positioning of the permanent infrastructure; for example, to avoid localised constraints or unknown or unforeseeable issues that may arise. This could include previously unidentified poor ground conditions which may require a pylon to be moved slightly for geotechnical reasons, such as ground stability.
4.3.12	Where some details are still to be finalised, the ES should, to the best of the applicant's knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the Project as it may be constructed have been properly assessed.	Where details are still to be finalised, the ES assess the effects of the Project against the maximum extent of the proposed development. Section 9 of the ES topic chapters (document references 6.1 to 6.16) covers flexibility in design or construction and sensitivity testing. This outlines any new or different significant effects that may occur through the application of flexibility that is allowed for within the draft DCO (document reference 3.1) compared to the baseline scenario presented in the earlier sections of the topic chapter. The flexibility allows for micro-siting of pylons and the alignment of the 400 kV overhead line within the LoD during detailed design and construction, without triggering the need to revise the EIA. Further details regarding what is included within the baseline scenario and within the sensitivity assessment can be found in ES Chapter 4: Project Description (document reference 6.4).
4.3.15 – 4.3.16	Applicants are obliged to include in their ES, information about the reasonable alternatives they have studied. This should include an indication of the main reasons for	The Infrastructure Planning (EIA) Regulations requires applicants to document alternative development options considered as part of the application for development consent.

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	the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility. In some circumstances, the NPSs may impose a policy requirement to consider alternatives.	Part 1 of Schedule 4 of the EIA Regulations requires that the ES includes an outline of the main alternatives studied by National Grid and an indication of the main reasons for National Grid's choice, taking into account the environmental effects. It is also noted that the NPS requires the ES to describe how the social, economic and environmental effects have been taken into account when making decisions between alternatives. ES Chapter 3: Alternatives (document reference 6.3) includes an assessment of alternatives, and environmental considerations in choosing a preferred option and route. Alternatives are also a requirement of the Habitats Regulations Assessment Report (document reference 5.3) however, only if adverse effects on the integrity of European sites are identified at the Appropriate Assessment stage (Stage 2). As stated, the Habitats Regulations Assessment Report confirms that Stage 2 Appropriate Assessment found no adverse effect on the integrity of the SPA and Ramsar Site would occur once mitigation measures identified in the Outline CoCP (document reference 7.2) are employed. Hence, the Project is not required to consider alternatives under the Habitats Directive.
4.3.17	Where there is a policy or legal requirement to consider alternatives, the applicant should describe the alternatives considered in compliance with these requirements.	The Infrastructure Planning (EIA) Regulations requires applicants to document alternative development options considered as part of the application for development consent. ES Chapter 3: Alternatives (document reference 6.3) includes an assessment of alternatives setting out the environmental considerations in choosing a preferred option and route. Chapter 5 of the Planning Statement (document reference 5.6) sets out how planning policy, namely EN-1 and EN-5, as well as the requirements of the Electricity Act and the principles of the Holford and Horlock Rules have influenced the options appraisal process, demonstrating how such policy objectives have been embedded into the design of the Project.

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	Secretary of State decision making	
4.3.18	The Secretary of State should consider the worst-case impacts in its consideration of the application and consent, providing some flexibility in the consent to account for uncertainties in specific Project details.	The assessment presented within Sections 7: Residual Effect of each ES topic chapter (document references 6.1 to 6.16) identifies the likely significant effects based on a reasonable worst case. In addition, ES Chapter 17: Cumulative Effects (document reference 6.17) assesses the intra-project and inter-project effects. This assessment is based on the construction method described in ES Chapter 4: Project Description (document reference 6.4) and the Proposed Alignment that is shown on ES Figure 4.1: Proposed Project Design (document reference 6.4.F1). However, it should be noted that the permanent aspects of the Project, including pylon locations, are not fixed and could be located anywhere within the LoD, as defined on the Work Plans (document reference 2.3).
4.3.19	The Secretary of State should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy, or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.	ES Chapter 17: Cumulative Effects (document reference 6.17) and the accompanying appendices (document references 6.17.A1 to 6.17.A3) detail the Cumulative Effects Assessment for the Project. This includes an assessment of effects on the environment, local economy and community receptors.
4.3.20	The Government has set 13 legally binding targets for England under the Environment Act 2021, covering the areas of: biodiversity; air quality; water; resource efficiency and waste reduction; tree and woodland cover; and Marine Protected Areas. Meeting the legally binding targets will be a shared endeavour that will require a whole of government approach to delivery. The Secretary of State have regard to the ambitions, goals and targets set out in the Government's Environmental Improvement Plan 2023 for improving the natural environment and heritage. This includes	The Project is compliant with the Environment Act 2021 insofar as it is relevant to the Project. Where relevant to the Project, all these topics are covered in full in the ES. Policy on these topics is provided in the designated and proposed revised NPS, which provide policy directly relevant to the development of NSIP.

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	having regard to the achievement of statutory targets set under the Environment Act.	
4.3.22	Given the level and urgency of need for new energy infrastructure, the Secretary of State should, subject to any relevant legal requirements (e.g. under the Habitats Regulations) which indicate otherwise, be guided by the following principles when deciding what weight should be given to alternatives: • the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner; and • only alternatives that can meet the objectives of the proposed development need to be considered. The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals. Alternatives not among the main alternatives studied by the applicant (as reflected in the ES) should only be considered to the extent that the Secretary of State thinks they are both important and relevant to the decision.	ES Chapter 3: Alternatives (document reference 6.3) includes an assessment of alternatives setting out the environmental considerations in choosing a preferred option and route. Chapter 7 of the Planning Statement (document reference 5.6) sets out how planning policy, namely EN-1 and EN-5, have influenced the options appraisal process; demonstrating how such policy objectives have been embedded into the design of the Project.

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	As the Secretary of State must assess an application in accordance with the relevant NPS (subject to the exceptions set out in section 104 of the Planning Act 2008), if the Secretary of State concludes that a decision to grant consent to a hypothetical alternative proposal would not be in accordance with the policies set out in the relevant NPS, the existence of that alternative is unlikely to be important and relevant to the Secretary of State's decision. Alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision. Alternative proposals which are vague or immature can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision. It is intended that potential alternatives to a proposed development should, wherever possible, be identified before an application is made to the Secretary of State (so as to allow appropriate consultation and the development of a suitable evidence base in relation to any alternatives which are particularly relevant). Therefore, where an alternative is first put forward by a third party after an application has been made, the Secretary of State may place the onus on the person proposing the alternative to provide the evidence for its suitability as such and the Secretary of State should not necessarily expect the applicant to have assessed it.	

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4.4	**Health**	
4.4.1	Energy infrastructure has the potential to impact on the health and well-being ("health") of the population. Access to energy is clearly beneficial to society and to our health as a whole. However, the construction of energy infrastructure and the production, distribution and use of energy may have negative impacts on some people's health.	ES Chapter 10: Health and Wellbeing (document reference 6.10) details the assessment of the potential residual effects of the Project on Health and Wellbeing. The chapter covers an assessment of construction and operational (including maintenance) effects on: • Health related environmental change (for example air quality, noise, traffic and transport related effects) • Mental health and wellbeing • The perceptions of impacts arising from Electric and Magnetic Fields (EMFs) of the Project in relation to mental health and wellbeing.
4.4.3	New energy infrastructure may also affect the composition and size of the local population, and in doing so have indirect health impacts, for example if it in some way affects access to key public services, transport, or the use of open space for recreation and physical activity.	ES Chapter 10: Health and Wellbeing (document reference 6.10) provide assessments of the likely effects on health and wellbeing that could result from the construction and operation (including maintenance) of the Project. The Project has been designed to follow the mitigation hierarchy as far as practicable, to, in the first instance, avoid or reduce and reduce health and wellbeing impacts through the process of design development. The Project will avoid works within designated open space. An Open Space Assessment is provided in Chapter 7 and Appendix B of the Planning Statement (document reference 5.6). In the case of the Project, there are no increased demands or impacts on open spaces as a result of the operation of the Project.
	Applicant assessment	
4.4.4 – 4.4.5	As described in the relevant sections of this NPS and in the technology specific NPSs, where the Project has an effect on humans, the ES should assess these effects for each element of the Project, identifying any potential	ES Chapter 10: Health and Wellbeing (document reference 6.10) provide assessments of the likely effects on health and

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	adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate. The impacts of more than one development may affect people simultaneously, so the applicant should consider the cumulative impact on health in the ES where appropriate.	wellbeing that could result from the construction and operation (including maintenance) of the Project. The mitigation hierarchy has been applied to the design of Project, to, in the first instance, avoid or reduce and reduce health and wellbeing impacts through the process of design development. This has included sensitive routeing and siting of infrastructure. The Project has avoided sensitive features such as centres of population and community, healthcare, and education facilities, through the corridor and routeing studies. During construction, the Project would comply with the good practice measures within the Outline CoCP (document reference 7.2) which has a number of measures that would avoid or reduce effects on health. The Project has been designed in accordance with National Grid design standards and will be compliant with the guidelines and policies relating to EMF stated in NPS EN-5 (DESNZ, 2024b), including the ICNIRP guidelines. Compliance with these guidelines and policies mean that the Project will already have designed out potential effects from EMF to a level to meet health and safety standards Cumulative impacts are assessed in ES Chapter 17: Cumulative Effects (document reference 6.17). National Grid have prepared an Equality Impact Assessment (document reference 7.14) to assess the Project's potential impacts on vulnerable groups and protected characteristic groups, as defined under the Equality Act 2010. The Equality Impact Assessment demonstrates whether and how National Grid has paid due regard to the needs of protected characteristic groups in line with the Equality Act 2010 and the Public Sector Equality Duty PSED.
4.4.6	Opportunities should be taken to mitigate indirect impacts, by promoting local improvements to encourage health and wellbeing, this includes potential impacts on vulnerable groups within society and impacts on those with protected characteristics under the Equality Act 2010, i.e. those groups which may be differentially impacted by a development compared to wider society as a whole.	

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		The assessment has identified that the construction and decommissioning phases may give rise to temporary negative equality impacts, particularly in relation to: • Diversions and closures of Public Rights of Way (PRoW), which may affect older people, disabled people, and those with limited mobility; • Increased construction traffic, which may impact vulnerable road users and those accessing community facilities; • Noise, vibration, and air quality changes, which may differentially affect children, older people, pregnant women, and people with sensory or respiratory conditions; • Visual changes, which may affect neurodivergent individuals sensitive to alterations in their environment. These impacts are not expected to be substantial in nature and are mitigated through embedded design measures, good practice construction management, and additional mitigation where required. The project does not require the compulsory acquisition of residential properties, and no known equality impacts have been identified in relation to land acquisition.
	Secretary of State decision making	
4.4.7 - 4.4.8	Generally, those aspects of energy infrastructure which are most likely to have a significantly detrimental impact on health are subject to separate regulation (for example for air pollution) which will constitute effective mitigation of them, so that it is unlikely that health concerns will either by themselves constitute a reason to refuse consent or require specific mitigation under the Planning Act 2008. However, not all potential sources of health impacts will be mitigated in this way, and the Secretary of State may want to take account of health concerns when setting	ES Chapter 10: Health and Wellbeing (document reference 6.10) provide assessments of the likely effects on health and wellbeing that could result from the construction and operation (including maintenance) of the Project. ES Chapter 7: Air Quality (document reference 6.7) and ES Chapter 14: Noise and Vibration (document reference 6.14) further details the assessment of potential residual effects of the Project on air (dust, traffic emissions and generator and non-road mobile machinery emissions) and noise (during constructions) respectively.

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	requirements relating to a range of impacts such as noise.	The Project has been designed to follow the mitigation hierarchy as far as practicable, to, in the first instance, avoid or reduce and reduce health and wellbeing impacts through the process of design development. This has included sensitive routeing and siting of infrastructure. The Project has avoided sensitive features such as centres of population and community, healthcare, and education facilities, through the corridor and routeing studies. During construction, the Project would comply with the good practice measures within the Outline CoCP (document reference 7.2) which has a number of measures that would avoid or reduce effects on health.
4.6	**Environmental and Biodiversity Net Gain**	
4.6.1 and 4.6.2	Environmental net gain is an approach to development that aims to leave the natural environment in a measurably better state than beforehand. Projects should therefore not only avoid, mitigate and compensate harms, following the mitigation hierarchy, but also consider whether there are opportunities for enhancements. Biodiversity net gain is an essential component of environmental net gain. Projects in England should consider and seek to incorporate improvements in natural capital, ecosystem services and the benefits they deliver when planning how to deliver biodiversity net gain.	As set out in ES Chapter 8: Ecology and Biodiversity (document reference 6.8), ES Chapter 11: Historic Environment (document reference 6.11), and ES Chapter 13: Landscape and Visual (document reference 6.13), the Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce adverse impacts through the process of design development, and by embedding measures into the design of the Project. National Grid has committed to deliver at least 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project will achieve a minimum of 10% Biodiversity Net Gain (BNG) (though onsite and offsite BNG) and has undertaken a BNG assessment (based on Natural England's Statutory Biodiversity Metric 2024 version (as of June 2025)) which is presented in the Biodiversity Net Gain Report (document reference 7.1). National Grid's approach is to provide any on-site BNG in a coordinated manner in locations that do not prejudice the siting or routeing of future electricity infrastructure, such as

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		substation extensions or customer connections. This approach is in the best interests of nature and is economical and efficient because it safeguards onsite BNG and means that on-site landscape screening or other environmental mitigation can also contribute towards BNG. Criteria for good design for Energy Infrastructure. Discussions are currently taking place between National Grid and the Waveney and Little Ouse Recovery (WaLOR) scheme (Suffolk Wildlife Trust, 2025), a landscape recovery scheme which is located in the same geographic area as the Project. This project is seeking to deliver a number of BNG units in addition to the delivery of the WaLOR scheme and National Grid have discussed the opportunity to deliver approximately 600 area habitat units. This could comprise a mixture of woodland, other neutral grassland as well as the potential to deliver wetland mosaic habitats. The final mix of units and location will be explored as the WaLOR scheme develops. Suffolk Wildlife Trust have also identified Market Weston Fen a habitat bank in Suffolk that comprises mixed scrub and other neutral grassland. National Grid is currently in discussion with both parties to sign an Expression of Interest and updated details will be provided accordingly. Essex Wildlife Trust and National Grid are in discussion with regard to the potential to assist with the requirement of approximately 400 units in Essex, which include other neutral grassland, mixed scrub, individual trees and acid grassland. National Grid will continue to work with Essex Wildlife Trust to identify potential sites as the Project progresses. ‘Environmental Areas’ have been identified across the Project as part of on-site mitigation. Multifunctional areas were prioritised providing mitigation or enhancements for different environmental aspects i.e. sites where landscape mitigation and biodiversity gains could be achieved together. National

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		Grid would retain ownership of these Environmental Areas and therefore National Grid can commit to a 30-year habitat management and monitoring plan. The following areas have been identified as 'Environmental Areas' and presented in the Outline Landscape and Ecological Management Plan (LEMP) (document reference 7.4): • Land around Norwich Main Substation (areas not included in the Norwich Main Substation Extension Planning application) • Land around EACN Substation • Land around Tilbury North Substation and Tilbury North (Warley Side) and Tilbury North (Tilbury Side) CSE Compounds (with Lower Thames Crossing) • Land around Tilbury North Substation and Tilbury North (Warley Side) and Tilbury North (Tilbury Side) CSE Compounds (without Lower Thames Crossing) • Land around Wenham Grove CSE Compound • Land around Great Horkesley (EACN Side) CSE Compound • Land around Great Horkesley (Tilbury Side) CSE Compound • Land around Fairstead (EACN Side) and Fairstead (Tilbury Side) CSE Compounds.
	Applicant assessment	
4.6.6	Energy NSIP proposals, whether onshore or offshore, should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible.	Despite BNG not yet being a mandatory requirement for Nationally Significant Infrastructure Projects (NSIPs), National Grid has committed to deliver at least a 10% Environmental Net Gain on all construction Projects. This includes delivering BNG and, for this Project, National Grid has set a voluntary target of a minimum 10% BNG. The Biodiversity Net Gain

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		Report (document reference 7.1) outlines how National Grid will deliver 10% BNG on this Project. In the absence of legal obligation or NSIP-specific guidance, National Grid's approach to BNG for NSIP Projects is to: • Meet the policy requirements within the current NPS • Deliver its corporate commitments to deliver at least 10% BNG with wider benefits • Maximise the benefits and value from consumer funded BNG • Follow the spirit of the TCPA BNG legislation and guidance, including using the Statutory Biodiversity Metric
4.6.7 and 4.6.8	In England applicants for onshore elements of any development are encouraged to use the latest version of the biodiversity metric to calculate their biodiversity baseline and present planned biodiversity net gain outcomes. This calculation data should be presented in full as part of their application. Where possible, this data should be shared, alongside a completed biodiversity metric calculation, with the Local Authority and Natural England for discussion at the pre-application stage as it can help to highlight biodiversity and wider environmental issues which may later cause delays if not addressed.	In the absence of a biodiversity metric specifically designed for NSIPs, the Statutory Biodiversity Metric (Department for Environment, Food and Rural Affairs (Defra), 2024), designed for Town and Country Planning Applications (TCPA), has been and would be used to calculate the Project's baseline and post-development biodiversity value, in order to demonstrate how the Project's BNG commitments can be delivered. It is acknowledged that Defra commenced an open consultation on 28 May 2025 on improving the implementation of biodiversity net gain for nationally significant infrastructure projects. The matters discussed in this consultation include introducing 10% BNG delivery (using the statutory biodiversity metric) for NSIPs from May 2026. As National Grid have already sought to delivery 10% BNG as part of this Project which have been calculated using the statutory biodiversity metric, the outcomes of the consultation are not considered to alter the approach already taken. The biodiversity metric calculates three 'types' of biodiversity units (BU) in three sperate 'modules' of the metric: • Area habitat units

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		• Hedgerow units • Watercourse units Chapter 3 of the Biodiversity Net Gain Report (document reference 7.1) provides further details about the methodology used for the Biodiversity Metric. Chapter 4 presents the results of the Biodiversity Metric as part of sharing the data with Interested Parties.
4.6.10	Biodiversity net gain should be applied after compliance with the mitigation hierarchy and does not change or replace existing environmental obligations, although compliance with those obligations will be relevant to the question of the baseline for assessing net gain and if they deliver an additional enhancement beyond meeting the existing obligation, that enhancement will count towards net gain.	This assessment presented in the Biodiversity Net Gain Report (document reference 7.1) represents an initial calculation based on the current stage of the Project and would be updated and refined at key milestones to further develop the forecast for net biodiversity change. Updates to the assessment would be made based on refinement of the Project design and construction information, including the habitat impacted/avoided and construction timetable and development of the Outline LEMP (document reference 7.4). As the Project is developed, opportunities would be sought to further apply the mitigation hierarchy and to increase the distinctiveness and condition of the habitats created.
4.6.11	Biodiversity net gain can be delivered onsite or wholly or partially off-site. We encourage details of any off-site delivery of biodiversity net gain to be set out within the application for development consent.	As outlined in the Biodiversity Net Gain Report (document reference 7.1) while every effort has been made to deliver the required BNG through replacement planting and on-site mitigation, given the scale and nature of the Project, +10% BNG is not achievable within the Project. Off-site habitat creation and enhancement at a registered habitat bank, carried out by a third party, will be used to ensure that an overall +10% net gain would be achieved. Biodiversity is not physically bound by planning authority boundaries and therefore a holistic approach is proposed for any off site habitat creation and/or enhancements, with the aim to deliver a biodiversity legacy ideally in each of the three counties crossed by the Project (Norfolk, Suffolk and Essex).
4.6.12	When delivering biodiversity net gain off-site, developments should do this in a manner that best contributes to the achievement of relevant wider strategic outcomes, for example by increasing habitat connectivity, enhancing other ecosystem service outcomes, or considering use of green infrastructure strategies. Reference should be made to relevant national or local plans and strategies, to inform off-site biodiversity net gain delivery. If published, the relevant	

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	strategy is the Local Nature Recovery Strategy (LNRS). If an LNRS has not been published, the relevant consenting body or planning authority may specify alternative plans, policies or strategies to use.	Neither of the three counties have an adopted Local Nature Recovery Strategy. Consultations with third-party stakeholders are on-going to secure off-site compensation to offset the impacts of the Project.
4.6.13	In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as • reductions in GHG emissions • reduced flood risk • improvements to air or water quality, • climate adaptation, • landscape enhancement • increased access to natural greenspace, or • the enhancement, expansion or provision of trees and woodlands The scope of potential gains will be dependent on the type, scale, and location of specific Projects. Applicants should look for a holistic approach to delivering wider environmental gains and benefits through the use of nature-based solutions and Green Infrastructure.	Chapter 7 of the Planning Statement (document reference 5.6) includes details on the wider environmental gains which would be delivered by the Project. National Grid has embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project. Embedded measures are those that are intrinsic to and built into the design of the Project, which have been presented in Table 4.2 in ES Chapter 4: Project Description (document reference 6.4). Standard mitigation measures, comprising management activities and techniques, would be implemented during construction of the Project to limit effects through adherence to good site practices and achieving legal compliance. The Outline CoCP (document reference 7.2) sets out the required mitigation measures and environmental commitments that will be implemented during the construction phase of the Project. Additional mitigation measures have also been proposed over and above any embedded and standard mitigation measures including the Outline LEMP (document reference 7.4) has been produced to detail the additional environmental measures that would be implemented to avoid, minimise, mitigate and compensate (ecology only) the landscape and visual and ecological features likely to be impacted during construction and operation (and maintenance). It sets out how the land, vegetation and habitats would be reinstated following construction. It includes details on additional mitigation

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		measures required for ecology during and post-construction, as well as detailing any required management of these receptors post-construction. The Outline LEMP (document reference 7.4) is secured by Requirement 4 in the draft DCO (document reference 3.1) As presented in ES Appendix 4.1: Greenhouse Gas Assessment (document reference 6.4.A1) the total CO2e estimated on the Project is 376,214 tCO2e. This is split into 333,4617 tCO2e for capital (construction) carbon (which would be spread over the whole construction duration), 39,199 tCO2e for transmission losses during 40 years of operation and 3,398 tCO2e for Non SF6 loss through leakage. National Grid follows the principles of PAS 2080: 2023 Carbon Management in Infrastructure and Built Environment, throughout the project development process and require this of its contractors. PAS 2080 is a global standard for managing infrastructure carbon. This framework looks at the whole value chain, aiming to reduce carbon and reduce cost through more intelligent design, construction and use. Design optimisation in line with the carbon reduction hierarchy is included below: • Reduce the elements and materials required for the construction phase of the Project • Use alternative raw materials and resources, such as those with a higher proportion of recycled content • Use efficient construction processes, such as manufacture and assembly design.
4.6.15	Applications for development consent should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains have been considered, and where appropriate, incorporated into proposals as part of good design	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) and the Biodiversity Net Gain Report (document reference 7.1) states that National Grid have committed to delivering at least 10% BNG with wider environmental and societal benefits through a combination of replacement planting, and on-site and off-site mitigation. On-site habitat creation and

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	(including any relevant operational aspects) of the Project.	enhancement will be delivered around permanent assets (i.e. substations and CSE compounds) in the form of mitigation areas labelled 'Environmental Areas' for landscape planting (and BNG). The location of these areas is presented in ES Figure 4.1: Proposed Project Design (document reference 6.4.F1). Off-site BNG locations are not confirmed. As described above, opportunities are being explored with local stakeholders.
4.6.18	Opportunities for environmental, social, and economic enhancements, protection and mitigation measures are identified in a number of sections in Part 5 of this NPS, which provides guidance on the impacts of new energy infrastructure.	Noted.
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4.6.1 – 4.6.3 (Note formatting error in EN-1 text)	Although achieving biodiversity net gain is not currently an obligation on applicants, Schedule 15 of the Environment Act 2021 contains provisions which, when commenced, mean the Secretary of State may not grant an application for Development Consent Order unless satisfied that a biodiversity gain objective is met in relation to the onshore development in England to which the application relates. The biodiversity gain objective will be set out in a biodiversity gain statement (as defined under the Environment Act 2021). Normally these statements would be included within an NPS, but the Act allows for the statement to be published separately where a review of an NPS has begun before the provisions are commenced, as is the case with these energy NPSs. Under the provision of the Environment Act 2021, any such separate biodiversity gain statement will be regarded as being contained within these NPSs.	As set out in the Biodiversity Net Gain Report (document reference 7.1) the Environment Act 2021 introduces a mandatory requirement for 10% biodiversity net gain (BNG), for new developments consented under the Town and Country Planning Act 1990 (TCPA) to ensure that they enhance biodiversity. It is anticipated that NSIPs, consented through a Development Consent Order (DCO) under the Planning Act 2008, would be subject to the BNG requirement from May 2026. The Project is anticipated be submitted in August 2025 and therefore prior to the BNG mandatory requirement for NSIP applications. Despite BNG not yet being a mandatory requirement for NSIPS, National Grid has sought to deliver 10% BNG with wider environmental and societal benefits on all construction projects, including this Project. The Biodiversity Net Gain Report (document reference 7.1) presents the initial (application stage) BNG calculation undertaken for the Project using Natural England's Statutory Biodiversity Metric (as of

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	The Secretary of State should give appropriate weight to environmental and biodiversity net gain, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited.	June 2025) in order to demonstrate how BNG could be achieved on the Project.
4.6.15	Applications for development consent should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains have been considered, and where appropriate, incorporated into proposals as part of good design (including any relevant operational aspects) of the project.	
4.7	**Criteria for good design for Energy Infrastructure**	
4.7.1 – 4.7.2	The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object – be it a building or other type of infrastructure – including fitness for purpose and sustainability, is equally important. Applying good design to energy Projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.	Good design of transmission infrastructure is primarily governed by application of the Holford and Horlock rules within technical limitations to meet safety, security, cost effectiveness and operational requirements. The Project's design, detailed in ES Chapter 4: Project Description (document reference 6.4) and informed by alternatives in ES Chapter 3: Alternatives (document reference 6.3), reflects National Grid's duty to be economical, efficient, and safe. The Design and Access Statement (document reference 7.15) sets out how the Project adheres to the 'criteria for good design for Energy Infrastructure' with reference to the PINS advice guide and the NIC design principles. The importance of process and addressing sustainability are essential elements of good design. The emphasis placed on the importance of process through the Project's evolution and delivering sustainability is set out in within this Design and Access Statement (document reference 7.15)

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4.7.3	Good design is also a means by which many policy objectives in the NPSs can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts such as noise. Projects should look to use modern methods of construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, Projects should include the reuse of material.	The Design Approach for Site Specific Infrastructure (DASSI) (document reference 7.16) explains the approach to materials. Schedule 3 of the Draft DCO (Requirements) controls how the Project is built by securing conditional control relating to design. Requirement 11 ensures that the final appearance of permanent buildings is consistent with the approved design principles in the DASSI as certified under Schedule 18. It provides a mechanism for enforceable design-led detailing post consent, ensuring matters agreed during examination are delivered throughout construction whilst still allowing flexibility for innovation at detailed design stage.
4.7.4	Given the benefits of good design in mitigating the adverse impacts of a Project, applicants should consider how good design can be applied to a Project during the early stages of the Project lifecycle.	Section 6 of the Planning Statement (document reference 5.6) sets out the project evolution and design approach taken from the onset to submission. The Design and Access Statement (document reference 7.15) sets out a summary of how good design has been applied to the Project.
	Applicant assessment	
4.7.5	To ensure good design is embedded within the Project development, a Project board level design champion could be appointed, and a representative design panel used to maximise the value provided by the infrastructure. Design principles should be established from the outset of the Project to guide the development from conception to operation. Applicants should consider how their design principles can be applied post-consent.	The Design and Access Statement (document reference 7.15) sets out National Grid's design principles which have guided the evolution of the Project. The Design and Access Statement states that, in accordance with the Design Principles for National Infrastructure (National Infrastructure Commission, 2020), National Grid will appoint a design champion to provide independent oversight and advocacy for good design throughout the lifecycle of the project, the design champion will act as a critical friend, ensuring the design principles secured through the DCO are upheld during detailed design development and implementation. There is a section in the Design and Access Statement (document reference 7.15) which covers the secure stage post-consent.

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4.7.6	Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, land form and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area. Applicants should also, so far as is possible, seek to embed opportunities for nature inclusive design within the design process.	The Design Approach for Site Specific Infrastructure (DASSI) (document reference 7.16) outlines the design principles, sets out an approach to the design and use of materials for site-specific infrastructure of non-linear works, and details those elements of the design which have some flexibility in their appearance. National Grid have considered the proposed materials and colour palette for the CSE compounds and new substation / substation extension, including buildings to be sensitive to the environment they are located in, where practicable. Further information is included in the Design Appraisal for Site-Specific Infrastructure (document reference 7.16). Schedule 3 of the DCO (Requirements) controls how the Project is built by securing conditional control relating to design. Requirement 11 ensures that the final appearance of permanent buildings is consistent with the approved design principles in the DASSI as certified under Schedule 18. It provides a mechanism for enforceable design-led detailing post consent, ensuring matters agreed during examination are delivered throughout construction whilst still allowing flexibility for innovation at detailed design stage. The Project has sought to embed landscape and visual mitigation in the design in the form of Environmental Areas proposed at the Substations and the CSE compounds as shown on the indicative landscape proposals within Appendix D of the Outline Landscape and Ecological Management Plan (OLEMP) (document reference 7.4).
4.7.7	Applicants must demonstrate in their application documents how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set	The design evolution of the Project has been an iterative process and this is set out in Section 6 of the Planning Statement (document reference 5.6). National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. The Design Development Report (document

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	out the reasons why the favoured choice has been selected.	reference 5.15) provides an explanation of the main changes in the route alignment and technology following the review and consideration of feedback received to the 2024 statutory consultation and to the targeted statutory and non-statutory consultations held in 2025. A Design and Access Statement (document reference 7.15) has also been produced that sets out a summary of how National Grid has approached good design and responded to the physical, environmental and socio-economic context of the proposed infrastructure. The Design Development Report and Design and Access Statement should be read alongside ES Chapter 3: Alternatives (document reference 6.3). National Grid has also had regard to the Horlock and Holford rules in respect to the siting of new transmission infrastructure and substations.
4.7.8	Applicants should consider taking independent professional advice on the design aspects of a proposal. In particular, the Design Council can be asked to provide design review for nationally significant infrastructure Projects and applicants are encouraged to use this service. Applicants should also consider any design guidance developed by the local planning authority.	Given the nature of electricity transmission infrastructure with technical design limitations, regulatory and other operational constraints – the amount of influence on design is therefore limited. An Internal Design Review Note has been prepared by a design specialist and forms Appendix B of the Design and Access Statement (document reference 7.15). Appendix B reviews the rationale and design decisions within this application, demonstrating regard to the Nationally Significant Infrastructure Projects: Advice on Good Design (Planning Inspectorate, 2025) and the NIC design principles. The Design and Access Statement (document reference 7.15) and the Local Plans Policy Compliance Document (document reference 5.7) have considered the Project against the local plan design guidance where appropriate.
	Secretary of State decision making	
4.7.10 - 4.7.11	In the light of the above and given the importance which the Planning Act 2008 places on good design and	See response to 4.7.6 above.

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	sustainability, the Secretary of State needs to be satisfied that energy infrastructure developments are sustainable and, having regard to regulatory and other constraints, are as attractive, durable, and adaptable (including taking account of natural hazards such as flooding) as they can be. In the light of the above and given the importance which the Planning Act 2008 places on good design and sustainability, the Secretary of State needs to be satisfied that energy infrastructure developments are sustainable and, having regard to regulatory and other constraints, are as attractive, durable, and adaptable (including taking account of natural hazards such as flooding) as they can be. In doing so, the Secretary of State should be satisfied that the applicant has considered both functionality (including fitness for purpose and sustainability) and aesthetics (including its contribution to the quality of the area in which it would be located, any potential amenity benefits, and visual impacts on the landscape or seascape) as far as possible.	The Flood Risk Assessment (FRA) (document reference 7.9) has been submitted as part of the application for development consent focussing on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. A sequential approach has been taken to siting infrastructure for the Project, particularly those elements that are vulnerable to inundation. The proposed temporary construction compounds and Cable Sealing End (CSE) compounds are located in Flood Zone 1, with one exception concerning a CSE compound site at Little Wenham Grove that is partially situated in Flood Zone 3 in the updated flood mapping dataset. However, this CSE would be situated within the defined Limits of Deviation (LoD) to avoid Flood Zone 3, as secured by commitment W19 within the Outline Code of Construction Practice (CoCP) (document reference 7.2).The remaining structures, including above ground structures such as pylons and below ground structures such as the underground cables are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement.
4.7.12	In considering applications, the Secretary of State should take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security requirements which the design has to satisfy. Many of the wider impacts of a development, such as landscape and environmental impacts, will be important factors in the design process.	This is noted and the design considerations have taken place within the context of meeting National Grid's duty to be economical and efficient and also within the rigorous health and safety processes that National Grid has in place than govern how it designs and constructs its Projects safely. National Grid is already required to ensure that the Project is designed in accordance with standards set out within or overseen by, amongst others, the Electricity Supply, Quality and Continuity Regulations, British Standards (BS), European Standards, the 'Conseil International des Grands Réseaux Electriques', the International Electrotechnical Commission, and the Electricity Networks Association. In addition, the Project must accord with each of the following: National Grid

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		Design Standards, National Grid Technical Specification, National Grid Transmission Procedures, National Grid Policy Statement (Transmission), National Grid Technical Guidance Notes (Electricity) and National Grid Technical Reports (Electricity). In addition to the comments made above, regard has also been had to the Horlock and Holford rules in respect to the siting of new transmission infrastructure and substations and as described in detail in Chapter 5 of the Planning Statement (document reference 5.6). Both sets of rules have been deployed by National Grid and have formed an important part of developing the preferred route and design of the Project. For example, the route seeks to avoid siting above ground infrastructure in areas with significant amenity value, the most direct route is preferred to avoid the need for additional angle pylons, siting infrastructure in areas benefiting from existing advantageous vegetation screening is preferred and densely populated urban/residential areas should be avoided, where possible. Essentially the Proposed Alignment has been selected because it performed more strongly overall than any other options, having regard to these factors (amongst others).
4.7.13	The Secretary of State should consider such impacts under the relevant policies in this NPS. Assessment of impacts must be for the stated design life of the scheme rather than a shorter time period.	National Grid has assessed potential impacts of climate change and incorporated adaptation/resilience throughout the lifetime of the Project. National Grid has taken into account the impacts of climate change over the development lifetime.
4.7.14	The Secretary of State should consider taking independent professional advice on the design aspects of a proposal. In particular, the Design Council can be asked to provide design review for nationally significant infrastructure Projects.	See response to 4.7.8

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4.10	**Climate Change Adaptation and Resilience**	
	Applicant assessment	
4.10.5 – 4.10.7	In certain circumstances, measures implemented to ensure a scheme can adapt to climate change may give rise to additional impacts, for example as a result of protecting against flood risk, there may be consequential impacts on coastal change. In preparing measures to support climate change adaptation applicants should take reasonable steps to maximise the use of nature-based solutions alongside other conventional techniques. Integrated approaches, such as looking across the water cycle, considering coordinated management of water storage, supply, demand, wastewater, and flood risk can provide further benefits to address multiple infrastructure needs, as well as carbon sequestration benefits. In addition to avoiding further GHG emissions when compared with more traditional adaptation approaches, nature-based solutions can also result in biodiversity benefits and net gain, as well as increasing absorption of carbon dioxide from the atmosphere.	Consideration of climate change effects on flood risk over the lifetime of the Project are assessed within the FRA (document reference 7.9) which also documents the embedded and good practice measures included to make the Project resilient to climate change. National Grid has assessed potential impacts of climate change and incorporated adaptation/resilience throughout the lifetime of the Project. The Project has been designed to be resilient to climate change by locating the above ground elements of the Project, including the substations, CSE compounds and construction compounds, outside of Flood Zones 2 and 3 as described in the FRA. The CSE compound site at Wenham Grove is partially situated in Flood Zone 3 following the release of updated flood mapping dataset from the Environment Agency in March 2025. This CSE compound would be laid out in accordance with the sequential approach, whereby the most vulnerable components are located in areas at lowest risk of flooding. The requirements for compensation of loss of floodplain storage associated with the pylons is addressed in the following sub-section and secured by commitment W17 in the Outline CoCP (document reference 7.2). No discernible loss of floodplain storage is associated with the CSE compound, associated above ground infrastructure has a very limited footprint. The remaining structures, including above ground structures such as pylons and below ground structures such as the underground cables are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement.

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		The Outline CoCP (document reference 7.2) describes the flood practice measures including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime.
4.10.8 – 4.10.10	New energy infrastructure will typically need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g. site flooding, limited water availability, storms, heatwave and wildfire threats to infrastructure and operations) and indirect (e.g. access roads or other critical dependencies impacted by flooding, storms, heatwaves or wildfires) impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure. The ES should set out how the proposal will take account of the projected impacts of climate change, using government guidance and industry standard benchmarks such as the Climate Change Allowances for Flood Risk Assessments, Climate Impacts Tool and British Standards for climate change adaptation, in accordance with the EIA Regulations. Applicants should assess the impacts on and from their proposed energy project across a range of climate change scenarios, in line with appropriate expert advice and guidance available at the time.	The impact of climate change, including the risk of flooding, have been considered during the optioneering and design evolution process. ES Chapter 3: Alternatives (document reference 6.3) and ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) sets out how the Project has been designed to avoid area of significant flood risk. With the exception of the Wenham Grove CSE Compound the substations and CSE compounds would be located in Flood Zone 1, see the FRA (document reference 7.9) for further details. The remaining structures including above ground structures such as pylons and below ground structures such as the underground cable are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. The Lead Local Flood Authorities did not raise any concerns around the use of National Grid's technical standards as part of engagement undertaken to date – see ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) which sets out the comments received during engagement. The permanent drainage design at the substations and the CSE compounds would be developed in liaison with the Lead Local Flood Authority (LLFA). Commitment W08 in the Outline CoCP (document reference 7.2) sets out that surface water runoff will be managed in accordance with the requirements and standards of the relevant LLFA. Surface water runoff will be captured using sustainable drainage techniques that will be

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		designed to allow for climate change resilience and with consideration of exceedance flow routes. With these measures in place, the Project is considered to be resilient to climate change over the Project design life.
4.10.11	Applicants should demonstrate that proposals have a high level of climate resilience built-in from the outset and should also demonstrate how proposals can be adapted over their predicted lifetimes to remain resilient to a credible maximum climate change scenario. These results should be considered alongside relevant research which is based on the climate change projections.	The Met Office UK Climate Projections (UKCP24) (Met Office, 2024) provide an assessment of likely climate change trends for the 21st century, with potential changes including wetter winters and drier summers (with higher intensity rainfall), that could affect soil conditions, land grade and farming practices, increase the risk of flooding etc. These factors have been taken into account in the FRA (document reference 7.9).
4.10.12	Where energy infrastructure has safety critical elements, the applicant should apply a credible maximum climate change scenario. It is appropriate to take a risk-averse approach with elements of infrastructure which are critical to the safety of its operation.	See response to 4.10.9 – 4.10.10
	Secretary of State decision making	
4.10.13	The Secretary of State should be satisfied that applicants for new energy infrastructure have taken into account the potential impacts of climate change using the latest UK Climate Projections and associated research and expert guidance (such as the EA's Climate Change Allowances for Flood Risk Assessments or the Welsh Government's Climate change allowances and flood consequence assessments) available at the time the ES was prepared to ensure they have identified appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure, including any decommissioning period) available at the time the ES was prepared to ensure they have identified appropriate mitigation or adaptation	The Met Office UK Climate Projections (UKCP24) (Met Office, 2024) provide an assessment of likely climate change trends for the 21st century, with potential changes including wetter winters and drier summers (with higher intensity rainfall), that could affect soil conditions, land grade and farming practices, increase the risk of flooding etc. These factors have been taken into account in the FRA (document reference 7.9) and the assessments in the relevant topic chapters of the ES such as ES Chapter 6: Agriculture and Soils (document reference 6.6). National Grid has also embedded mitigation measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project. Table 4.2 of ES Chapter 4: Project Description (document reference 6.4)

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	measures. This should cover the estimated lifetime of the new infrastructure, including any decommissioning period	identifies the embedded mitigation measures which have been incorporated into the design.
4.10.15	The Secretary of State should be satisfied that there are not features of the design of new energy infrastructure critical to its operation which may be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections, taking account of the latest credible scientific evidence on, for example, sea level rise (for example by referring to additional maximum credible scenarios – i.e. from the Intergovernmental Panel on Climate Change or EA) and that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime.	National Grid has assessed potential impacts of climate change and incorporated adaptation/resilience throughout the lifetime of the Project. Section 5.3 of the DAS sets out the 'sustainability vision' of the Project and details how the Project has been designed to be resilient to climate change. The Project takes account of the latest Met Office UK Climate Projections (UKCP24) (Met Office, 2024) to provide an assessment of likely climate change trends for the 21st century, with potential changes including wetter winters and drier summers (with higher intensity rainfall), that could affect soil conditions, land grade and farming practices, increase the risk of flooding etc. These factors have been taken into account in the FRA (document reference 7.9). The FRA concludes that during operation (and maintenance) over the Project lifetime, flood risk from fluvial, surface water, tidal and groundwater sources is assessed to be low due to locating key infrastructure in Flood Zone 1 and areas at low risk of flooding from surface and groundwater sources. The residual risk, associated with the pylons in areas of medium to high risk, is assessed as low due to the low vulnerability of this type of infrastructure to inundation. National Grid has also embedded mitigation measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project. Table 4.2 of ES Chapter 4: Project Description (document reference 6.4) identifies the embedded mitigation measures which have been incorporated into the design. National Grid has undertaken a GHG assessment in ES Appendix 4.1: Greenhouse Gas Assessment (document

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		reference 6.4.A1). The assessment concludes that the construction and operational CO2e numbers are not considered to have a material impact on the ability of the Government to meet its carbon reduction targets and therefore are not significant.
4.10.16	If any adaptation measures give rise to consequential impacts (for example on flooding, water resources or coastal change) the Secretary of State should consider the impact of the latter in relation to the application as a whole and the impacts guidance set out in Part 5 of this NPS.	Applicant is not aware of any consequential effects from its adaptation measures.
4.10.17	Any adaptation measures should be based on the latest set of UK Climate Projections, the government's latest UK Climate Change Risk Assessment, when available and in consultation with the EA's Climate Change Allowances for Flood Risk Assessments or the Welsh Government's Climate change allowances and flood consequence assessments.	Adaptation measures are detailed above at 4.10.8 – 4.10.10. The Project is accounting for the latest guidance on climate change (UKCP18). The relevant factors have been factored into the FRA (document reference 7.9) and the assessments in the relevant topic chapters of the ES. The Outline CoCP (document reference 7.2) describes the flood practice measures including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime.
4.10.19	Adaptation measures should be required to be implemented at the time of construction where necessary and appropriate to do so. However, where they are necessary to deal with the impact of climate change, and that measure would have an adverse effect on other aspects of the project and/or surrounding environment (for example coastal processes), the Secretary of State may consider requiring the applicant to keep the need for the adaptation measure and ensure	National Grid has identified a number of good practice measures, which generally comprise measures imposed through legislative requirements or represent standard sector good practices. These include measures to reduce nuisance from construction activities. The good practice measures are set out in the Outline CoCP (document reference 7.2).

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	that the measure could be implemented should the need arise, rather than at the outset of the development (for example increasing height of existing, or requiring new, sea walls).	
4.12	**Pollution Control and Other Environmental Regulatory Regimes**	
	Applicants assessment	
4.12.7 - 4.12.8	Applicants should make early contact with relevant regulators, including EA or NRW and the MMO, to discuss their requirements for Environmental Permits and other consents, such as marine licences. Wherever possible, applicants should submit applications for Environmental Permits and other necessary consents at the same time as applying to the Secretary of State for development consent.	National Grid made early contact with relevant regulators including the Marine Management Organisation MMO. The Consultation Report (document reference 5.1) details the MMOs comments which concluded that the development is an inland development so would not require a marine licence, therefore National Grid have not consulted further with the MMO. National Grid has continued to engage with the Environment Agency throughout the design and evolution of the Project, through various consultation exercises and through thematic meetings. All engagement is recorded in the Draft Statement of Common Ground Environment Agency (document reference 5.9.16.
	Secretary of State decision making	
4.12.9	In considering an application for development consent the Secretary of State should focus on whether the development itself is an acceptable use of the land or sea, and the impact of that use, rather than the control of processes, emissions or discharges themselves.	Noted.
4.12.10	The Secretary of State should work on the assumption that the relevant pollution control regime and other environmental regulatory regimes, including those on land drainage, water abstraction and biodiversity, will be properly applied and enforced by the relevant regulator. The Secretary of State should act to complement but not seek to duplicate them.	The Project will be constructed and operated in compliance with all relevant legislation, consents and permits. Table 5.1 of the Outline CoCP (document reference 7.2) identifies the anticipated licences, assents, consents and permits required for the Project. Further details can be referred in Consents and Licences Required Under Other Legislation (document reference 5.5).

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4.12.13	In considering the impacts of the Project, the Secretary of State may wish to consult the regulator on any management plans that would be included in an Environmental Permit application.	See response to 4.12.10.
4.12.14	The Secretary of State should be satisfied that development consent can be granted taking full account of environmental impacts.	See response to 4.2.10. An ES (Volume 6 of DCO application) has been submitted with the application for development consent. The ES takes full account of the environmental impacts.
4.12.15	Working in close cooperation with the EA or NRW and/or the pollution control authority, and other relevant bodies, such as the MMO, the SNCB, Drainage Boards, and water and sewerage undertakers, the Secretary of State should be satisfied, before consenting any potentially polluting developments, that: • the relevant pollution control authority is satisfied that potential releases can be adequately regulated under the pollution control framework • the effects of existing sources of pollution in and around the site are not such that the cumulative effects of pollution when the proposed development is added would make that development unacceptable, particularly in relation to statutory environmental quality limits.	An Outline CoCP (document reference 7.2) has been submitted as part of the application for development consent. This sets out the actions and measures that would be implemented to reduce the risk of a pollution incident along with proactive actions that would be taken should any pollution incident occur. Prior to the application, the CoCP was shared with the relevant planning authorities, Natural England and the Environment Agency for comment. The Environment Agency responded with comments on several matters from the Outline CoCP relating to water resources including abstraction and discharge and flood defences – these comments are under discussion. Natural England did not provide any comments on the CoCP.
4.12.16	The Secretary of State should not refuse consent on the basis of pollution impacts unless there is good reason to believe that any relevant necessary operational pollution control permits or licences or other consents will not subsequently be granted. On this basis, it is reasonable for the Secretary of State to consider residual amenity issues only when considering whether the development	ES Chapter 7: Air Quality (document reference 6.7), ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9), ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) and ES Chapter 14: Noise and Vibration (document reference 6.14) present the likely significant effects which could give rise to pollution impacts. The Project has been designed applying the mitigation hierarchy, as far as practicable, in order to avoid or reduce adverse effects in accordance with this NPS. An

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	itself is an acceptable use of the land or sea, and on the impacts of that use.	Outline CoCP (document reference 7.2) has been submitted as part of the application for development consent. This sets out the actions and measures that would be implemented to reduce the risk of a pollution incident along with proactive actions that would be taken should any pollution incident occur.
4.13	**Safety**	
	Applicant assessment	
4.13.5	Applicants should consult with the HSE on matters relating to safety.	National Grid has consulted with the HSE. In its response to statutory consultation, the HSE considered matters within its remit. The HSE identified that the draft Order Limits fall into the consultation zones of several Major Accident Hazard Sites (MAHS) and the consultation zones of several notified Major Accident Hazard Pipelines (MAHP). Regard has been had to both hazard areas.
4.14.5	Applicants must consult the (HSA) and HSE at pre-application stage if the project is likely to need hazardous substances consent. Hazardous substances consents are a part of the planning regime which contributes to public safety	An Outline CoCP (document reference 7.2) has been submitted as part of the application for development consent. This sets out the actions and measures that would be implemented to reduce the risk of a pollution incident along with proactive actions that would be taken should any pollution incident occurring including appropriate storage and handling of fuels and other substances hazardous to the environment. The contractor would ensure that any potentially hazardous waste is correctly stored, tested, recorded and disposed of. National Grid continue to engage with HSE with respect to compliance with health and safety legislation.
4.14.6	HSE sets a consultation distance around every site with hazardous substances consent and notifies the relevant local planning authorities. The applicant should therefore consult the local planning authority at pre-application stage to identify whether its proposed site is	The HSE has been consulted throughout the consultation activities on the Project. In its response to consultation in 2023, 2024 and 2025, the HSE identified that the draft Order Limits fall into the consultation zones of several Major Accident

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	within the consultation distance of any site with hazardous substances consent and, if so, should consult the HSE for its advice on locating the particular development on that site. Where a hazardous substance consent has been deemed to be granted, the developer is required to send the relevant HSA any information required by them for the purposes of a register.	Hazard Sites and the consultation zones of several notified Major Accident Hazard Pipelines. The Project does not oversail any of the specific sites identified by the HSE. National Grid has been and continues to engage with the relevant site operators in order to ensure there are no adverse impacts. National Grid is in consultation with operators of the Major Accident Pipeline and specialists to assess and mitigate permanent and temporary construction impacts. The Project is not subject to the Control of Major Accident Hazards Regulations 2015.
4.15	**Common Law Nuisance and Statutory Nuisance**	
	Applicant Assessment	
4.15.5	At the application stage of an energy NSIP, possible sources of nuisance under section 79(1) of the EPA 1990 and how they may be mitigated or limited should be identified by the applicant so that appropriate requirements can be included in any subsequent order granting development consent (see Section 5.7 on dust, odour, artificial light etc. and Section 5.12 on noise and vibration).	A Statement of Statutory Nuisance (document reference 5.4) has been submitted with the application for development consent. The Outline CoCP (document reference 7.2) includes good practice measures to avoid or reduce the effects of dust, lighting, noise and vibration. These measures would reduce impacts that could otherwise result in nuisance during construction. The development authorised by the DCO must be undertaken in accordance with the CoCP, pursuant to Requirement 4 of the draft DCO (document reference 3.1). National Grid and their contractor would carry out all work in accordance with the CoCP during the construction of the Project unless otherwise agreed with the relevant planning authority. The Statement of Statutory Nuisance (document reference 5.4) assesses possible sources of nuisance under section 79(1) of the EPA 1990. With the good practice measures in place, no

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		breach of Section 79(1) of the EPA 1990 is expected as a result of the Project.
	Secretary of State decision making	
4.15.6	At the application stage of an energy NSIP, possible sources of nuisance under section 79(1) of the EPA 1990 and how they may be mitigated or limited should be considered by the Secretary of State so that appropriate requirements can be included in any subsequent order granting development consent (see Section 5.7 on dust, odour, artificial light etc. and Section 5.12 on noise and vibration).	See response to 4.15.5
4.15.7	The Secretary of State should note that the defence of statutory authority is subject to any contrary provision made by the Secretary of State in any particular case in a Development Consent Order (section 158(3) of the Planning Act 2008). Therefore, subject to Section 5.7 and Section 5.12, the Secretary of State can disapply the defence of statutory authority, in whole or in part, in any particular case, but in so doing should have regard to whether any particular nuisance is an inevitable consequence of the development.	Noted.
4.16	**Security Considerations**	
	Applicant assessment	
4.16.6	Where national security implications have been identified, the applicant should consult with relevant security experts from NPSA, ONR (for civil nuclear) and/or DESNZ to ensure security measures have been adequately considered in the design process and that adequate consideration has been given to the management of security risks.	National Grid is a provider of critical infrastructure across the UK. In this role, National Grid maintains regular dialogue with a range of organisations with responsibility for both local and national crime prevention and security. As such, all sites and infrastructure would be designed and operated to the relevant security standards. ES Chapter 4: Project Description (document reference 6.4) outlines security measures that have been incorporated into

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		the design to ensure the assets are protected. This includes measures such as lighting, gates and fencing.
5	**Generic Impacts**	
5.1	**Introduction**	
5.2	**Air Quality and Emissions**	
5.2.3	For many air pollutants there is not a threshold below which there is no health impact so it is important that energy infrastructure schemes consider not just how a scheme may impact statutory air quality limits, objectives or targets but also measures to mitigate all emissions in order to minimise human exposure to air pollution, especially for those who are more susceptible to the impacts of poor air quality.	ES Chapter 7: Air Quality (document reference 6.7) presents the assessment of the likely significant air quality effects that could result from the Project. During the construction phase, construction machinery and vehicles could generate dust and fine particulate matter, particularly through earthwork and soil stripping activities. Machinery and vehicles would also emit exhaust emissions through the combustion of fossil fuels. There is limited potential for the Project to generate dust and emissions during the operational phase, due to the limited activities associated with inspection and maintenance, therefore, this has been scoped out of the assessment. A construction dust risk assessment has been undertaken and is reported in ES Appendix 7.3: Air Quality Assessment Results (document reference 6.7.A3).
5.2.4	In addition, a particular effect of air emissions from some energy infrastructure may be eutrophication, which is the excessive enrichment of nutrients in the environment. Eutrophication from air pollution results mainly from emissions of NOx and ammonia. The main emissions from energy infrastructure are from altering the competitive balance of species and thereby damaging biodiversity. In aquatic ecosystems it can cause changes to algal composition and lead to algal blooms, which remove oxygen from the water, adversely affecting plants and fish. The effects on ecosystems can be short term or irreversible and can have a large	No eutrophication effects are anticipated as the Project does not result in the increase in new residential accommodation or intensified agricultural uses.

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	impact on ecosystem services such as pollination, aesthetic services and water supply.	
	Applicant assessment	
5.2.8	Where the project is likely to have adverse effects on air quality the applicant should undertake an assessment of the impacts of the proposed project as part of the ES.	An air quality assessment has been undertaken within ES Chapter 7: Air Quality (document reference 6.7).
5.2.9	The ES should describe: existing air quality concentrations and the relative change in air quality from existing levels; any significant air quality effects, mitigation action taken and any residual effects, distinguishing between the project stages and taking account of any significant emissions from any road traffic generated by the project; the predicted absolute emissions, concentration change and absolute concentrations as a result of the proposed project, after mitigation methods have been applied; and any potential eutrophication impacts.	The air quality assessment presented in ES Chapter 7: Air Quality (document reference 6.7) assesses the likely air quality effects that would result from the Project and considers the existing baseline conditions and the likely changes and effects to air quality levels during the construction phase. The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routeing and siting of infrastructure and temporary works. An assessment of construction dust impacts on local amenity and ecological sites is also provided as detailed in ES Appendix 7.1: Air Quality Assessment Methodology (document reference 6.7.A1) and ES Appendix 7.3: Air Quality Assessment Results (document reference 6.7.A3). The assessment confirms that with the implementation of the proposed standard mitigation measures, the effects of construction on air quality in regard to dust, traffic emissions and NRMM emission and human health effects are anticipated to be not significant. As set out in the Scoping Report (document reference 6.19) and agreed within the Scoping Opinion (document reference 6.20), the operational phase of the Project will not result in any significant impacts to air quality, and no further assessment has been carried out in the ES.

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		The assessments conclude that during construction the effects on air quality from vehicle emissions generated by the Project would be negligible and therefore not significant. These conclusions assume design mitigation and management measures proposed, set out in the Outline CoCP (document reference 7.2) are implemented. The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. Measures to control air quality emissions including dust are set out in the Outline CoCP (document reference 7.2). The detailed CoCP would come forward post consent as secured by Requirement 4 in Schedule 3 of the draft DCO (document reference 3.1). No eutrophication impacts are anticipated.
5.2.10	In addition, applicants should consider the Environment Targets (Fine Particulate Matter) (England) Regulations 2022 and associated Defra guidance.	ES Chapter 7: Air Quality (document reference 6.7) has considered this guidance.
5.2.11	Defra publishes future national projections of air quality based on estimates of future levels of emissions, traffic, and vehicle fleet. Projections are updated as the evidence base changes and the applicant should ensure these are current at the point of an application. The applicant's assessment should be consistent with this but may include more detailed modelling and evaluation to demonstrate local and national impacts. If an applicant believes they have robust additional supporting evidence, to the extent they could affect the conclusions of the assessment, they should include this in their representations to the Examining Authority along with the source.	The Defra background air quality mapping projections from the 2021-base year dataset were used in the assessment which were current at the point of application. This is referenced in ES Chapter 7: Air Quality (document reference 6.7).

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5.2.12	Where a proposed development is likely to lead to a breach of any relevant statutory air quality limits, objectives or targets, or affect the ability of a non-compliant area to achieve compliance within the timescales set out in the most recent relevant air quality plan/strategy at the time of the decision, the applicant should work with the relevant authorities to secure appropriate mitigation measures to ensure that those statutory limits, objectives or targets are not breached.	There are no significant emissions resulting from the Project that would pose a threat to statutory air quality limits. During the operation of the Project, vehicle numbers are expected to be very low, and the only anticipated emissions should be from maintenance vehicles, which is likely to be negligible and sporadic with no quantifiable effect on local air quality.
5.2.13	The Secretary of State should consider whether mitigation measures are needed both for operational and construction emissions over and above any which may form part of the project application. A construction management plan may help codify mitigation at this stage. In doing so the Secretary of State should have regard to the Air Quality Strategy in England, or the Clean Air Plan for Wales in Wales, or any successors to these and should consider relevant advice within Local Air Quality Management guidance and PM2.5 targets guidance.	An Outline CoCP (document reference 7.2) has been submitted as part of the application for development consent. This sets out the actions and measures that would be implemented to reduce the risk of a pollution to air, land, ground and surface water, waste, odour, noise, light and other such amenity. With respect to pollution and environmental amenity, from an air quality perspective, ES Chapter 7: Air Quality (document reference 6.7) assesses high, medium and low sensitivity receptors with respect to dust. An assessment is also made of the likely air quality effects that would result from the Project and considers the existing baseline conditions and the likely changes and effects to air quality levels during the construction phase. The assessment confirms that with the implementation of the proposed standard mitigation measures, the effects of construction on air quality in regard to dust soiling, and human health effects are anticipated to be not significant. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) notes that it was agreed within EIA Scoping Opinion that the effects from vehicle emissions associated with diverted traffic during construction can be scoped out of the ES, provided it can be demonstrated that the predicted volumes of diverted traffic would not exceed the relevant indicative criteria for air quality assessment set out in the Institute of Air Quality

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		Management (IAQM) guidance. No significant negative effects on habitats because of construction traffic have been identified in ES Chapter 7: Air Quality (document reference 6.7) and so air quality effects to habitats and species associated with construction traffic was scoped out of the ecology and biodiversity assessment.
5.2.14	The mitigations identified in Section 5.14 on traffic and transport impacts will help mitigate the effects of air emissions from transport.	The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. ES Chapter 7: Air Quality (document reference 6.7) assesses the air quality impacts from construction traffic. ES Chapter 7: Air Quality (document reference 6.7) states that embedded measures have been included in the design of the Project, such as the alignment and associated Order Limits have been designed to avoid large residential and urban areas and consequently avoids areas of existing poor air quality. In addition, an almost continuous haul road is proposed as part of the design to reduce construction traffic using the local highway network. By diverting construction vehicles away from large residential and urban areas, the haul roads help to reduce localised emissions and associated air quality impacts in these locations. Standard mitigation measures, comprising management activities and techniques would be implemented during construction of the Project to limit effects through adherence to good site practices and achieving legal compliance. The Outline CoCP (document reference 7.2) contains relevant good practice measures relating to air quality. The full results for construction traffic data are provided in ES Appendix 7.3: Air Quality Assessment Results (document reference 6.7.A3). The assessment concludes that with the

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		inclusion of standard mitigation, above the embedded measures, the residual impacts associated with the construction phase are not significant.
	Secretary of State decision making	
5.2.15	Many activities involving air emissions are subject to pollution control. The considerations set out in Section 4.12 on the interface between planning and pollution control therefore apply. The SoS must also consider duties under other environmental targets and have regard to policies set out in the Government's Environmental Improvement Plan 2023.	ES Chapter 7: Air Quality (document reference 6.7) has considered this guidance.
5.2.16	The Secretary of State should give air quality considerations substantial weight where a project would lead to a deterioration in air quality. This could for example include where an area breaches any national air quality limits or statutory air quality objectives. However, air quality considerations will also be important where substantial changes in air quality levels are expected, even if this does not lead to any breaches of statutory limits, objectives or targets.	ES Chapter 7: Air Quality (document reference 6.7) concludes that there are no significant emissions resulting from the Project that would pose a threat to statutory air quality limits. During the operation of the Project, vehicle numbers are expected to be very low, and the only anticipated emissions should be from maintenance vehicles, which is likely to be negligible and sporadic with no quantifiable effect on local air quality.
5.2.17	The Secretary of State should give air quality considerations substantial weight where a project is proposed near a sensitive receptor site, such as an education or healthcare facility, residential use or a sensitive or protected habitat.	ES Chapter 7: Air Quality (document reference 6.7) has assessed the impact of the Project on any sensitive receptors. Sensitive receptors have been considered following the IAQM guidance (IAQM, 2024) which sets out, within Box 6 of the document, the approach for identifying high, medium and low sensitivity receptors. The construction traffic and generator/ NRMM assessment has treated all sensitive human receptors equally. Sensitivity was determined based on locations that reflect typical human exposure over the relevant averaging periods defined by air quality standards. The assessment concluded that, with the proposed mitigation measures (set out in the Outline CoCP (document reference 7.2) in place the

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		annual mean pollutant concentrations for NO2, PM10 and PM2.5 which were predicted at 59 sensitive human receptors all resulted in a predicted negligible magnitude of change, and therefore effects are considered to not be significant. The Project would require the use of generators at construction compounds. Locations where temporary compounds are within 100 m of sensitive human receptors have been reviewed using GIS and the results are provided in Table A7.3.11 in ES Appendix 7.3: Air Quality Assessment Results (document reference 6.7.A3) and shown on ES Figure 7.7: Air Quality Generators (document reference 6.7.F7). Mitigation measure AQ2 of the Outline CoCP (document reference 7.2) states that where generators are located next to sensitive sites consideration will be given to increasing the release height of emissions for sufficient dispersion, and relevant abatement technology. It is considered that effects from emissions from construction equipment and plant are likely to be neutral and not significant.
5.2.18	Where a project is proposed near to a sensitive receptor site for air quality, if the applicant cannot provide justification for this location, and a suitable mitigation plan, the Secretary of State should refuse consent.	See response to 5.2.17.
5.2.19	In all cases, the Secretary of State must take account of any relevant statutory air quality limits, objectives and targets. If a project will lead to non-compliance with a statutory limit, objective or target the Secretary of State should refuse consent.	As concluded in Section 7 of ES Chapter 7: Air Quality (document reference 6.7) the Project would not lead to non-compliance with a statutory limits, objective or target
5.3	**Greenhouse Gas Emissions**	
5.3.3	As discussed in Part 2, energy infrastructure plays a vital role in decarbonisation. While all steps should be taken to reduce and mitigate climate change impacts, it is accepted that there will be residual emissions from	Noted.

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	energy infrastructure, particularly during the economy wide transition to net zero, and potentially beyond.	
	Applicant assessment	
5.3.4	All proposals for energy infrastructure projects should include a GHG assessment as part of their ES (See Section 4.3). This should include: • A whole life GHG assessment showing construction, operational and decommissioning GHG impacts, including impacts from change of land use. • An explanation of the steps that have been taken to drive down the climate change impacts at each of those stages. • Measurement of embodied GHG impact from the construction stage. • How reduction in energy demand and consumption during operation has been prioritised in comparison with other measures. • How operational emissions have been reduced as much as possible through the application of best available techniques for that type of technology. • Calculation of operational energy consumption and associated carbon emissions. • Whether and how any residual GHG emissions will be (voluntarily) offset or removed using a recognised framework. • Where there are residual emissions, the level of emissions and the impact of those on national and international efforts to limit climate change, both alone and where relevant in combination with other developments at a regional or national level, or sector level, if sectoral targets are developed.	National Grid has undertaken a GHG assessment in ES Appendix 4.1: Greenhouse Gas Assessment (document reference 6.4.A1). This calculates the CO2 equivalent (CO2e) comprising both CO2 and SF6 for the Project for the construction and operational (and maintenance) phases and compared them against relevant carbon budgets and emissions. The assessment concludes that the construction and operational CO2e numbers are not considered to have a material impact on the ability of the Government to meet its carbon reduction targets and therefore are not significant. SF6 is a gas commonly used in the electricity industry in electrical switchgear to insulate the live electrical parts and to safely switch the flow of electrical current on and off. This switchgear is used throughout the electrical network, including to connect the generation and storage of renewable energy of all types. As outlined in the Greenhouse Gas Assessment (document reference 6.4.A1) It is assumed that no SF6 equipment will be used in the Project, in accordance with National Grid policy. SF6 alternatives such as C4 or G3 have a 99% lower global warming potential (GWP) than SF6. Measures to reduce greenhouse gas emissions are set out in Appendix H of the CoCP: Greenhouse Gas Reduction Strategy (document reference 7.2.H).

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	Mitigation	
5.3.5	A GHG assessment should be used to drive down GHG emissions at every stage of the proposed development and ensure that emissions are minimised as far as possible for the type of technology, taking into account the overall objectives of ensuring our supply of energy always remains secure, reliable and affordable, as we transition to net zero.	ES Appendix 4.1: Greenhouse Gas Assessment (document reference 6.4.A1) describes the use of the Cost Book and Carbon Interface Tool (CIT) at different stages of the Project. The CIT is provided to the contractors tendering for the Project as they are required to provide a more detailed breakdown of materials, assets, equipment and energy that they propose to use in construction of the Project. On tender award, this CIT would become the 'carbon baseline' for the Project and the Great Grid Partnership who will support the delivery of the project (as set out in the Design and Access Statement (document reference 7.15)) would be incentivised to demonstrate a reduction in capital carbon over the duration of construction of the Project. The CIT and carbon footprint will be reviewed on a monthly basis and there would be key performance indicators (KPIs) in place to incentivise the Main Works Contractor(s) to reduce the carbon footprint against the initial baseline.
5.3.6	Applicants should look for opportunities within the proposed development to embed nature-based or technological solutions to mitigate or offset the emissions of construction and decommissioning.	ES Appendix 4.1: Greenhouse Gas Assessment (document reference 6.4.A1) describes how the Great Grid Partnership would be incentivised to demonstrate a reduction in capital carbon over the duration of construction of the Project. This is captured via the use of the CIT. The CIT and carbon footprint will be reviewed on a monthly basis and there would be key performance indicators (KPIs) in place to incentivise the Main Works Contractor(s) to reduce the carbon footprint against the initial baseline.
5.3.7	Steps taken to minimise and offset emissions should be set out in a GHG Reduction Strategy, secured under the Development Consent Order. The GHG Reduction Strategy should consider the creation and preservation of carbon stores and sinks including through woodland	The Climate Change Act 2008 set in law a long-term target to reduce the UK's GHG emissions to 80% below 1990 levels by 2050 and established the system of UK carbon budgets. In 2019, the UK government furthered the ambition and committed to bring all GHG emissions to net zero by 2050.

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	creation, hedgerow creation and restoration, peatland restoration and through other natural habitats.	As presented in ES Appendix 4.1: Greenhouse Gas Assessment (document reference 6.4.A1) the total CO2e estimated on the Project is.5376,214 tCO2e. National Grid follows the principles of PAS 2080: 2023 Carbon Management in Infrastructure and Built Environment, throughout the Project development process and require this of its contractors. In 2021, National Grid detailed a commitment to being fully net zero across all new construction projects by 2025/26 as part of the 'Our Net Zero Construction project' (National Grid, 2021). To deliver this, the focus will be on the absolute reduction of impacts associated with the delivery for the Project and this will be measured via the CIT. Residual emissions of all National Grid projects within the portfolio at the end of 2025/26 (and future years) would be aggregated and offsets delivered in line with National Grid's Offsetting policy guidelines. The assessment considered only the GHG related directly to construction and operation (and maintenance) of the Project. The Project would, however, make an important contribution to reducing GHG and reaching the UK government's target of net zero by 2050, by supporting the distribution of greener energy. ES Appendix 4.1: Greenhouse Gas Assessment (document reference 6.4.A1), states that it is assumed that no SF6 equipment will be used in the Project, in accordance with National Grid policy. SF6 alternatives such as C4 or G3 have a 99% lower global warming potential (GWP) than SF6. National Grid has presented its assessment of greenhouse gas and sought to eliminate the use of a potent greenhouse gas (SF6) from the Project.
	Secretary of State decision making	
5.3.8	The Secretary of State must be satisfied that the applicant has as far as possible assessed the GHG emissions of all stages of the development	ES Appendix 4.1: Greenhouse Gas Assessment (document reference 6.4.A1) presents the total CO2e estimated on the Project is 5376,214 tCO2e. National Grid follows the principles

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5.3.9	The Secretary of State should be content that the applicant has taken all reasonable steps to reduce the GHG emissions of the construction and decommissioning stage of the development.	of PAS 2080: 2023 Carbon Management in Infrastructure and Built Environment, throughout the Project development process and require this of its contractors. The Project would make an important contribution to reducing GHG and reaching the UK government's target of net zero by 2050, by supporting the distribution of greener energy. Appendix H: Green House Gas Reduction Strategy within the Outline CoCP (document reference 7.2) sets out the measures to reduce greenhouse gas emissions. Furthermore, as outlined in ES Appendix 4.1: Greenhouse Gas Assessment (document reference 6.4.A1), it is assumed that no SF6 equipment will be used in the Project, in accordance with National Grid policy. SF6 alternatives such as C4 or G3 have a 99% lower global warming potential (GWP) than SF6. National Grid has presented its assessment of greenhouse gas and sought to eliminate the use of a potent greenhouse gas (SF6) from the Project.
5.3.10	The Secretary of State should give appropriate weight to Projects that embed nature-based or technological processes to mitigate or offset the emissions of construction and decommissioning within the proposed development. However, in light of the vital role energy infrastructure plays in the process of economy wide decarbonisation, the Secretary of State must accept that there are likely to be some residual emissions from construction and decommissioning of energy infrastructure.	
5.3.11	Operational GHG emissions are a significant adverse impact from some types of energy infrastructure which cannot be totally avoided (even with full deployment of CCS technology). Given the characteristics of these and other technologies, as noted in Part 3 of this NPS, and the range of non-planning policies that can be used to decarbonise electricity generation, such as the UK ETS (see Section 2.4), government has determined that operational GHG emissions are not reasons to prohibit the consenting of energy projects or to impose more restrictions on them in the planning policy framework than are set out in the energy NPSs (e.g. the CCR requirements). Any carbon assessment will include an assessment of operational GHG emissions, but the policies set out in Part 2, including the UK ETS, can be applied to these emissions.	

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5.4	**Biodiversity and Geological Conservation**	
5.4.2	In the 25 Year Environment Plan, the government set out its vision for a quarter of-a-century action to help the natural work regain and retain good health. A commitment to review the plan every 5 years was set into law in the Environment Act 2021. The Environmental Improvement Plan was published in 2023, which reinforces the intent of the 25 Year Environment Plan and sets out a plan to deliver on its framework and vision. The government's policy for biodiversity in England is set out in the Environmental Improvement Plan 2023, the National Pollinator Strategy and the UK Marine Strategy. The aim is to halt overall biodiversity loss in England by 2030 and then reverse loss by 2042, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people. This aim needs to be viewed in the context of the challenge presented by climate change. Healthy, naturally functioning ecosystems and coherent ecological networks will be more resilient and adaptable to climate change effects. Failure to address this challenge will result in significant adverse impact on biodiversity and the ecosystem services it provides.	National Grid considers that the Project is compliant with the Plan insofar as it is relevant to the Project. The Plan sets out ten goals which include the achievement of: clean air; clean and plentiful water; thriving plants and wildlife; reduced risk of harm from environmental hazards like flooding and drought; the more sustainable and efficient use of resources from nature; enhanced beauty, heritage and engagement with the natural environment; mitigation and adaption to climate change; minimisation of waste; management of exposure to chemicals; and enhanced biosecurity. Where relevant to the Project, all these topics are covered in full in the ES (document reference 6.1 to 6.17).
	Habitats Regulations	
5.4.4 and 5.4.5	The highest level of biodiversity protection is afforded to sites identified through international conventions. The Habitats Regulations set out sites for which an HRA will assess the implications of a plan or project, including Special Areas of Conservation and Special Protection Areas.	In accordance with planning policy, Habitats Regulations Assessment (HRA) Report (document reference 5.3) has been prepared. The Appropriate Assessment concluded that there would be no significant adverse effects on the integrity of the Stour and Orwell Estuaries SPA and Ramsar Site with regard to hydrology or habitat loss / disturbance on functionally linked

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	As a matter of policy, the following should be given the same protection as sites covered by the Habitats Regulations and an HRA will also be required: (a) potential Special Protection Areas and possible Special Areas of Conservation; (b) listed or proposed Ramsar sites; and (c) sites identified, or required, as compensatory measures for adverse effects on any of the other sites covered by this paragraph.	land (FLL) associated with the waterbird assemblage, due to sufficient availability of alternative habitat within the 5 km IRZ that would support lapwing and golden plover that would be temporarily displaced by the construction works. No in-combination effects were identified as part of the assessment. As no significant adverse effects on the integrity of a European site (following the implementation of mitigation) has been identified during the Appropriate Assessment, the HRA does not require progression to Stage 3 of the HRA process. It is, therefore, considered that the assessment undertaken by National Grid is in accordance with the requirements of EN-1 in respect to habitats and species regulations.
	Sites of Special Scientific Interest (SSSIs)	
5.4.7	Many SSSIs are also designated as sites of international importance and will be protected accordingly. Those that are not, or those features of SSSIs not covered by an international designation, should be given a high degree of protection. Most National Nature Reserves are notified as SSSIs.	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) concludes that the Project would not directly affect any SSSIs as there are no SSSIs within the Project's Order Limits. The Project would not have a significant effect on any of the SSSI identified within the Study Area set out by ES Chapter 8. Furthermore, ES Appendix 17.3: Inter-Project Cumulative Effects Assessment (document reference 6.17.A3) concludes that no significant cumulative effects are anticipated for biodiversity during construction or operation in combination with other developments.
5.4.8	Development on land within or outside a SSSI, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits (including need) of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs.	Chapter 5 of the Planning Statement (document reference 5.6) sets out how planning policy, as well as the requirements of the Electricity Act and the principles of the Holford and Horlock Rules, have influenced the optioneering and design evolution process; including limiting impacts to SSSI features in the routing and design studies. This is also reported in ES Chapter 3: Alternatives (document reference 6.3) which documents the key environmental factors that were considered in the optioneering and design evolution process. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) concludes

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		that there are no significant effects on any SSSI as a result of the Project. Furthermore, ES Appendix 17.4: Inter-Project Cumulative Effects Matrix (document reference 6.17.A4) concludes that no significant cumulative effects are anticipated for biodiversity during construction or operation in combination with other developments. ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9) concludes there are no likely significant effects on SSSI with geological conservation interests.
	Regional and Local Sites	
5.4.12 and 5.4.13	Sites of regional and local biodiversity and geological interest, which include Regionally Important Geological Sites, Local Nature Reserves and Local Wildlife Sites, are areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery. They can also provide wider benefits including public access (where agreed), climate mitigation and helping to tackle air pollution. National planning policy expects plans to identify and map Local Wildlife sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks.	As noted in ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9) there are no Regional or Local Geological Sites affected by the Project. Potential impacts on sites of regional and local biodiversity interest, such as Local Nature Reserves and Local Wildlife Sites, have been assessed in ES Chapter 8: Ecology and Biodiversity (document reference 6.8). Through design and embedded measures impacts to these receptors have been avoided and/or mitigated. Where impacts are unavoidable, habitat reinstatement would take place post-construction. No likely significant residual effects in relation to biodiversity receptors during construction or operation are anticipated as a result of the Project.
	Ancient woodland, ancient trees, veteran trees and other irreplaceable habitats	
5.4.14 and 5.4.15	Irreplaceable habitats are habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Keepers of Time, the government's policy for	The Project has been designed in a way which prioritises the retention of vegetation wherever practicable in accordance with good practice measures as outlined within the Outline CoCP (document reference 7.2). Owing to the size of the Project it has not been possible to completely avoid the loss of such natural features. The Outline LEMP (document reference 7.4) sets out the principal measures that are required to help avoid,

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	ancient and native trees and woodlands in England sets out the government's commitment to maintain and enhance the existing area of ancient woodland, maintain and enhance the existing resource of known ancient and veteran trees, excluding natural losses from disease and death, and to increase the percentage of ancient woodland in active. Ancient and veteran trees found outside ancient woodland are also particularly valuable. Other types of irreplaceable habitats include blanket bog, limestone pavement, coastal sand dunes, spartina salt marsh swards, Mediterranean saltmarsh, scrub, and lowland fen.	minimise, mitigate and compensate (where relevant) the impacts to vegetation. In relation to Ancient Woodlands, the physical extent of each ancient woodland along the Project has been mapped based on a combination of aerial imagery and based on information obtained from the ground truthing woodland surveys. Table 8.23 in ES Chapter 8: Ecology and Biodiversity (document reference 6.7) lists the Ancient Woodlands identified within a 200m of the Project's Order Limits and identifies the proposed mitigation measure/commitment. The location and further information relating to all Ancient Woodlands is presented within Appendix 8.1: Habitats Report and presented on Figure A8.1.3: Ancient Woodland Locations (document reference 6.8.A1). In addition, the Project has considered 11 woodlands to be Ancient Woodland within ES Chapter 8: Ecology and Biodiversity (document reference 6.8) due to the Local Wildlife Site citations mentioning these woodlands support ancient woodland features. These woodlands have therefore been included in the impact assessment as Ancient Woodland. Potential impacts (excavation and non-excavation), in the absence of mitigation, were identified at 10 ancient woodland parcels. As a result of these Project commitments impacts associated with five ancient woodlands have been completely. The remaining 5 ancient woodlands (and the associated 15 m buffer) is unavoidable as all proposed works relate to the removal, undergrounding or modification of existing third-party infrastructure (11 kV, 33 kV, 132 kV), with the existing assets already located within the associated woodland or root protection zone. A comprehensive explanation of the Project approach to ancient woodland avoidance and minimisation of impact on ancient woodland is detailed in Appendix B: Ancient Woodland and Veteran Tree Strategy (document reference 7.4.B).

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		The precise boundary of each affected ancient woodland will be accurately mapped during pre-construction surveys, to ensure an accurate woodland boundary is determined. This updated information will be incorporated into the Final LEMP, with an updated version of this report (Appendix E) as required. Standard mitigation measures are included within the Outline CoCP (document reference 7.2). In relation to veteran trees, Appendix 13.6: Arboricultural Impact Assessment of ES Chapter 13: Landscape and Visual (document reference 6.13.A6) concludes that a total of 112 trees and four groups have been surveyed within the Project Study Area as veterans. Four individual veteran trees require removal, while 15 veteran trees and two veteran groups require crown management. A full record of the identified veteran trees is included in Table 7.3 of the Outline LEMP (document 7.4). Appendix B: Ancient Woodland and Veteran Tree Strategy (document reference 7.4.B) details the compensation and mitigation strategies for veteran trees and ancient woodland impacted. The final mitigation measures, remediation works and long-term monitoring are to be agreed at detailed design stage with the Project arboriculturist and the relevant landowners on a case-by-case basis. All management options discussed for veteran trees need to be achievable and therefore will need landowner consent and agreement with National Grid. Protection measures are to be in place prior to the commencement of construction or pre-construction works and require sign off by the Project Arboriculturist. Also see response to Paragraph 5.4.32 in respect to veteran trees.

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	Protection and enhancement of habitats and species	
5.4.16	Many individual species receive statutory protection under a range of legislative provisions. Other species and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales, as well as for their continued benefit for climate mitigation and adaptation and thereby requiring conservation action.	The Project and/ or mitigates maximum long-term significant adverse effects on important ecological features such as protected species and habitats, during the construction and operation (including maintenance) phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 3 of the draft DCO (document reference 3.1).
	Applicant assessment	
5.4.17 and 5.4.18	Where the development is subject to EIA the applicant should ensure that the ES clearly sets out any effects on internationally, nationally, and locally designated sites of ecological or geological conservation importance (including those outside England), on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats. The applicant should provide environmental information proportionate to the infrastructure where EIA is not required to help the Secretary of State consider thoroughly the potential effects of a proposed project.	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) details the likely significant effects of the Project with respect to biodiversity, including: internationally, nationally and locally designated sites; protected species and habitats; and other species identified as being of principal importance for the conservation of biodiversity. The chapter concludes that no residual significant adverse effects are predicted as a result of the construction and operation of the Project. ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9) details the likely significant effects of the Project with respect to geology and hydrogeology. As identified in ES Chapter 9: Geology and Hydrogeology (document reference 6.9), there are no statutory designated sites for geological importance and no potential Local Geological Sites or notified Local Geological Sites within the Study Area.
5.4.19 to 5.4.21	The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) and ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9) identify how National Grid has considered opportunities to conserve and enhance biodiversity and geological conservation interests. National

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	Applicants should consider wider ecosystem services and benefits of natural capital when designing enhancement measures. As set out in Section 4.7, the design process should embed opportunities for nature inclusive design. Energy infrastructure projects have the potential to deliver significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains (see Section 4.6 on Environmental and Biodiversity Net Gain). The scope of potential gains will be dependent on the type, scale, and location of each Project.	Grid will deliver biodiversity net gain by at least 10% or greater in environmental value, on this Project. Further details can be found in the Biodiversity Net Gain Report (document reference 7.1).
5.4.22	The design of Energy NSIP proposals will need to consider the movement of mobile / migratory species such as birds, fish and marine and terrestrial mammals and their potential to interact with infrastructure. As energy infrastructure could occur anywhere within England and Wales, both inland and onshore and offshore, the potential to affect mobile and migratory species across the UK and more widely across Europe (transboundary effects) requires consideration, depending on the location of development.	The full assessment of the impacts of the Project on ecology and biodiversity, including movement of mobile/ migratory species, and the proposed mitigation measures are detailed in ES Chapter 8: Ecology and Biodiversity (document reference 6.8) submitted as part of this DCO application. The Habitats Regulations Assessment Report (document reference 5.3) which supports this DCO also considers the movement of mobile/ migratory species. The full list of what has been included within the scope of the assessment or justification as to why it is not included, can be found ES Appendix 5.2: Scope of the Assessment (document reference 6.5.A2). The movement of mobile/ migratory species such as birds, fish and marine and terrestrial mammals has been considered in Table 8.23 of ES Chapter 8 (document reference 6.8). Effects on breeding and overwintering birds are assessed in ES Chapter 8: Ecology and Biodiversity (document reference 6.8). This was agreed with Natural England in July 2022, see ID 3.3.15 of the Draft Statement of Common Ground with Natural England (document reference 5.9.13). As set out in Section 8.7 of ES Chapter 8, this includes impacts on habitats in terms of permanent habitat loss, temporary

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		habitat loss, permanent habitat modification/degradation, and fragmentation (fragmentation impacts are typically described in terms of their impacts on species (rather than the habitats themselves). As stated in Section 3.3 and Paragraph 4.1.7 of the Habitats Regulations Assessment Report (document reference 5.3) there is evidence of two areas of Functionally Linked Land (FLL) within the Order Limits (in relation to the Stour and Orwell Estuaries SPA and Ramsar) which have been used by significant numbers of roosting lapwing and golden plover (which are part of the waterbird assemblage) which would be temporarily displaced during the installation of the 400 kV underground cabling. Although significant numbers of lapwing and golden plover have been recorded Table 3.2 of the assessment shows the generally low numbers and irregularity of records within the FLL Survey Locations across the survey period. The survey results also indicate that the lapwing and golden plover flocks the FLL are transient, likely using alternative arable habitat available in the surrounding area. The assessment concluded that there are significant areas of 'excellent' 'good' and 'average' alternative habitat in the 5 km IRZ therefore no additional mitigation measures are required for the birds that would be temporarily displaced. The Appropriate Assessment within the Habitats Regulations Assessment Report (document reference 5.3) concluded that there would be no significant adverse effects on the integrity of the Stour and Orwell Estuaries SPA and Ramsar Site with regard to hydrology or habitat loss / disturbance on FLL associated with the waterbird assemblage, due to sufficient availability of alternative habitat within the 5 km IRZ that would support lapwing and golden plover that would be temporarily displaced by the construction works.

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	Applicant assessment – Habitats Regulations	
5.4.25	The applicant should seek the advice of the appropriate SNCB and provide the Secretary of State with such information as the Secretary of State may reasonably require, to determine whether an HRA Appropriate Assessment (AA) is required. Applicants can request and agree 'Evidence Plans' with SNCBs, which is a way to record upfront the information the applicant needs to supply with its application, so that the HRA can be efficiently carried out. If an AA is required, the applicant must provide the Secretary of State with such information as may reasonably be required to enable the Secretary of State to conduct the AA. This should include information on any mitigation measures that are proposed to minimise or avoid likely significant effects.	The HRA Report (document reference 5.3) has been undertaken and was taken forward to Appropriate Assessment following advice from Natural England. Details on matters agreed with Natural England and matters for further discussion can be found in ID 3.3.14 to ID 3.3.17 (inclusive) of the Draft Statement of Common Ground with Natural England (document reference 5.9.13). The HRA Report (document reference 5.3) presents the HRA undertaken for the Project, which comprises Stage 1: Screening and Stage 2: Appropriate Assessment. It has concluded no likely significant effects. Stage 1 of the HRA process identified the potential for Likely Significant Effects (on its own or in-combination effects with other plans or projects) on three European sites: • Norfolk Valley Fens SAC • Stour and Orwell Estuaries Ramsar Site • Stour and Orwell Estuaries SPA. The potential LSEs relate to construction activities. All operation (and maintenance) LSEs have been screened out. In the absence of mitigation, direct LSEs through changes in hydrology could not be screened out for the Norfolk Valley Fens SAC or the Stour and Orwell Estuaries SPA and Ramsar Site. In the absence of mitigation, indirect LSEs through temporary land loss, fragmentation of habitat, disturbance (through noise, vibration, light and movement), changes in air quality and changes in hydrology could not be screened out at FLL for the waterbird assemblage qualifying feature of the Stour and Orwell Estuaries SPA and Ramsar Site. Two areas of FLL are present within the Order Limits, which have been used by

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		significant numbers of roosting Lapwing and Golden Plover which are part of the waterbird assemblage of the Stour and Orwell Estuaries SPA and Ramsar Site. The Appropriate Assessment concluded there would be no adverse effects on the integrity of the Norfolk Valley Fens SAC and the Stour and Orwell Estuaries SPA and Ramsar Site with regard to hydrology once mitigation measures within the Outline CoCP (document reference 7.2), secured through Requirement 4 of the draft DCO (document reference 3.1) are implemented. This includes direct and indirect (through FLL) effects at the Stour and Orwell Estuaries SPA and Ramsar Site. The Appropriate Assessment concluded there would be no adverse effects on the integrity of the Stour and Orwell Estuaries SPA and Ramsar Site with regard to air quality on FLL associated with the waterbird assemblage qualifying feature. This is primarily due to the FLL consisting of arable habitat which is not considered to be vulnerable to effects air quality effects. Furthermore, the Outline Dust Management Plan, appended to the Outline CoCP (document reference 7.2), secured through Requirement 4 of the draft DCO (document reference 3.1) will be adhered to during the works. Following an assessment of other plans and projects at Stage 1 Screening and Stage 2 Appropriate Assessment to determine the potential for an in-combination it was concluded that there would be no effect on the integrity of any European or Ramsar Sites, their qualifying features or their conservation objectives. As no adverse effects on the integrity of a European Site (following the implementation of mitigation) have been identified during the Appropriate Assessment, the HRA does not require progression to Stage 3 (derogation) of the HRA process.

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		It is, therefore, considered that the assessment undertaken by National Grid is in accordance with the requirements of EN-1 in respect to habitats and species regulations.
	Applicant assessment – Ancient woodland, ancient trees, veteran trees and other irreplaceable habitats	
5.4.32	Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operational phase.	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) identified that 51 blocks of ancient woodlands fall within 200 m of the Order Limits, of which 1.7 ha falls within the Order Limits. Table 8.23 in ES Chapter 8: Ecology and Biodiversity (document reference 6.7) lists the Ancient Woodlands identified within a 200m of the Project's Order Limits and identifies the proposed mitigation measure/commitment. The location and further information relating to all Ancient Woodlands is presented within Appendix 8.1: Habitats Report and presented on Figure A8.1.3: Ancient Woodland Locations (document reference 6.8.A1). In addition, the Project has considered 11 woodlands to be Ancient Woodland within ES Chapter 8: Ecology and Biodiversity (document reference 6.8) due to the Local Wildlife Site citations mentioning these woodlands support ancient woodland features. These woodlands have therefore been included in the impact assessment as Ancient Woodland. The Project has been designed in a way which prioritises the retention and conservation of significant trees. Owing to the size of the Project it has not been possible to completely avoid the loss of such natural features therefore an Ancient Woodland and Veteran Tree Strategy (Appendix E to the Outline LEMP (document reference 7.4)) has been prepared to support the application for development consent. The Ancient Woodland and Veteran Tree Strategy found that out of the 51 ancient woodlands within 200 m of the Project Order Limits, Potential impacts (excavation and non-excavation), in the absence of mitigation, were identified at 10 ancient woodland parcels. As a result of these Project

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		commitments impacts associated with five ancient woodlands have been completely. The remaining 5 ancient woodlands (and the associated 15 m buffer) is unavoidable as all proposed works relate to the removal, undergrounding or modification of existing third-party infrastructure (11 kV, 33 kV, 132_kV), with the existing assets already located within the associated woodland or root protection zone. Only four ancient woodlands (Round Wood, Rivenhall Thicks, Writtle-Writtlepark Woods and Clapgate Wood) have excavation works proposed within the 15 m buffer. All impacts are associated with unavoidable mitigation to third-party pre-existing assets required to facilitate the Project. A comprehensive explanation of the Project approach to ancient woodland avoidance and minimisation of impact on ancient woodland is detailed in Appendix B: Ancient Woodland and Veteran Tree Strategy (document reference 7.4.B). As stated in the Outline CoCP (document reference 7.2) the Project has committed to there being no physical works or breaking ground within 15 m of ancient woodland where at all practicable. Demarcation measures will be used to ensure this 15 m buffer is not breached. These embedded and standard mitigation measures are set out in the Outline LEMP (document reference 7.4) and the Ancient Woodland and Veteran Tree Strategy (an Appendix E to the Outline LEMP (document reference 7.4)). The implementation of the Outline Dust Management Plan set out within the Outline CoCP (document reference 7.2) would ensure no negative effects on ancient woodland because of dust. As set out in the Outline CoCP (document reference 7.2) where sensitive features are to be retained (i.e., veteran, and mature trees, and Ancient Woodland), an appropriate protective area or protection mechanisms will be established

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		using appropriate equipment or fencing and signage and will be inspected, repaired, and replaced as necessary. The protective areas will be shown on the 'Retention and Reinstatement Plans' contained within the Outline LEMP (document reference 7.4). With regard to mitigation for veteran trees, Appendix E: Ancient Woodland and Veteran Tree Strategy of the Outline LEMP (document reference 7.4), Table 5.1, outlines the order of priorities when it comes to veteran trees. In the first instance loss of veteran trees is to be avoided. With regard to veteran trees, Appendix 13.6: Arboricultural Impact Assessment of ES Chapter 13: Landscape and Visual (document reference 6.13.A6) concludes that a total of 112 trees and four groups have been surveyed within the Project Study Area as veterans. Four individual veteran trees require removal, while 15 veteran trees and two veteran groups require crown management. Where loss is unavoidable compensation would be achieved in accordance with the proposed compensation options set out in Table 5.1 of Appendix E: Ancient Woodland and Veteran Tree Strategy of the Outline LEMP (document reference 7.4). Veteran trees to be retained within proximity of construction compounds will be subject to protection measures to be in place prior to the commencement of construction or pre-construction works in accordance with the measures set out in Table 5.1 of Appendix E: Ancient Woodland and Veteran Tree Strategy of the Outline LEMP (document reference 7.4). Specifications for fencing are outlined in Section 7.3 of the Outline LEMP (document reference 7.4) and should be in accordance with clause 6.2 of BS 5387:2012. Barriers and / or ground protection will be used to safeguard RPA on site of veteran trees to be retained. A precautionary RPA has been provided around groups of trees with the RPA reflecting the maximum calculated extent. In accordance with clause 6.2.1.1

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		of BS 5387:2012, all barriers and ground protection will be installed prior to construction at each relevant location and remain in place until construction has ceased. To assess and ensure the effectiveness of the above remediation works, a monitoring programme will be agreed and adopted by the Project. The purpose of this is to assess the results of remediation works and adapt or amend as necessary on a case-by-case basis. Due to the ecological significance of veteran trees, the monitoring programme will cover a minimum of a 30-year period which aligns with Paragraph 10.4.2 of the Outline LEMP (document reference 7.4). The final mitigation measures, remediation works and long-term monitoring are to be agreed at detailed design stage with the Project arboriculturist and the relevant landowners on a case-by-case basis. All management options discussed for veteran trees need to be achievable and therefore will need landowner consent and agreement with National Grid. Protection measures are to be in place prior to the commencement of construction or pre-construction works and require sign off by the Project Arboriculturist.
	Applicant assessment – Protection and enhancement of habitats and species	
5.4.33 - 5.4.34	Applicants should consider any reasonable opportunities to maximise the restoration, creation, and enhancement of wider biodiversity, and the protection and restoration of the ability of habitats to store or sequester carbon as set out under Section 4.6. Consideration should be given to improvements to, and impacts on, habitats and species in, around and beyond developments, for wider ecosystem services and natural capital benefits, beyond those under protection and identified as being of principal importance. This may include considerations and opportunities identified through Local Nature Recovery Strategies, and national	The Outline CoCP (document reference 7.2) sets out the required mitigation measures and environmental commitments that will be implemented during the construction phase of the Project. The Project is also committed to adopting a sustainable approach to development by pro-actively taking measures to ensure that the Project leaves the environment in a better condition than it was before development (including but not limited to using reasonable endeavours to deliver 10% BNG). The Project will seek to provide strategic habitat enhancement and creation, aiming to identify and implement opportunities to improve habitat quality and connectivity and align with national

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	goals and targets set through the Environment Act 2021 and the Environmental Improvement Plan 2023.	nature recovery objectives and Projects. Such measures may include specific habitat creation and enhancement measures and additional receptor specific measures such as the creation of habitat piles and installation of bird and bat boxes. Mitigation for the permanent loss of habitat would be delivered through the creation / enhancement of habitat associated with achieving BNG for the Project. Within the Order Limits seven areas of land (defined as Environmental Areas) are proposed around the Project's permanent assets, where there is sufficient space. To ensure the target is reached, any additional creation / enhancement would be delivered outside of the Order Limits, as identified in the Biodiversity Net Gain Report (document reference 7.1). Habitats of Principal Importance that would be lost on a temporary basis would be reinstated in line with the habitat reinstatement principles set out in Chapter 9 of the Outline LEMP (document reference 7.4).
	Mitigation	
5.4.35	Applicants should include appropriate avoidance, mitigation, compensation and enhancement measures as an integral part of the proposed development. In particular, the applicant should demonstrate that: • during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works • the timing of construction has been planned to avoid or limit disturbance during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements	Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features as far as reasonably practicable. National Grid has embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project. Embedded measures are those that are intrinsic to and built into the design of the Project, which have been presented in Table 4.2 in ES Chapter 4: Project Description (document reference 6.4). Those relevant to Ecology and Biodiversity include:

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	• habitats will, where practicable, be restored after construction works have finished • opportunities will be taken to enhance existing habitats rather than replace them, and where practicable, create new habitats of value within the site landscaping proposals. Where habitat creation is required as mitigation, compensation, or enhancement the location and quality will be of key importance. In this regard habitat creation should be focused on areas where the most ecological and ecosystems benefits can be realised. • mitigations required as a result of legal protection of habitats or species will be complied with.	• The Project has committed to deliver at least 10% BNG with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. Further details can be found in the Biodiversity Net Gain Report (document reference 7.1) • Sensitive routeing and siting – Avoid and reduce as far as practicable effects on identified biodiversity receptors. Surveys were ongoing throughout the design process with live information fed into the change control process • The design would allow for landscape planting around Norwich Main Substation, CSE compounds, the new EACN Substation, around the new Tilbury North Substation (two options have been devised, one in the event that the Lower Thames Crossing Project is constructed, and the other if it is not)) and around the existing Norwich Main Substation • Mitigation areas for landscape planting (and BNG) around permanent features are labelled 'Environmental Areas' and are presented on ES Figure 4.1: Proposed Project Design (document reference 6.4.F1) and ES Figure 4.2: Proposed Project Design –– Permanent Features (document reference 6.4.F2). Landscape planting would reduce effects on landscape and visual receptors in the longer term – further details are provided in the Outline LEMP (document reference 7.4) • For access roads and haul roads, the Project requires the crossing of multiple ditches, drains and watercourses. Large or sensitive watercourses, for example those designated as a main river, and those with Water Framework Directive (WFD) status, would be crossed by the temporary haul road using temporary clear span bridges

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		• Temporary and permanent sustainable drainage features form part of Project design to ensure that water quality is protected in the watercourses that would receive surface water from the Project
5.4.36	Applicants should produce and implement a Biodiversity Management Strategy as part of their development proposals. This could include provision for biodiversity awareness training to employees and contractors so as to avoid unnecessary adverse impacts on biodiversity during the construction and operation stages.	National Grid has prepared an Outline LEMP (document reference 7.4) which serves as a biodiversity management strategy. The Outline LEMP sets out the principal measures that are required to help avoid, minimise, mitigate and compensate (ecology only) for the potential ecological and landscape and visual effects of the Project during and post construction, as per the mitigation hierarchy. Chapter 3 of the Outline LEMP includes details on how biodiversity awareness training will be delivered. Standard mitigation measures are included within the Outline CoCP (document reference 7.2) and should be read in conjunction with the Outline LEMP (document reference 7.4). The Outline CoCP (document reference 7.2) is secured by Requirement 4 in the draft DCO (document reference 3.1).
5.4.38	To further minimise any adverse impacts on geodiversity, where appropriate applicants are encouraged to produce and implement a Geodiversity Management Strategy to preserve and enhance access to geological interest features, as part of relevant development proposals.	ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9) considers the potential impacts on the geology and hydrogeology during construction and operation of the Project, and whether those impacts are likely to result in significant effects on groundwater, mineral deposits, designated geological sites, surface water (associated with groundwater impacts) and human health. This also sets out the good practice measures that will be undertaken during construction activities to reduce the risk to geology and hydrogeology receptors and support the assessment. An Outline CoCP (document reference 7.2) has been submitted as part of the application for development consent. This sets out the actions and measures that would be implemented to

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		reduce the risk of a pollution incident along with proactive actions that would be taken should any pollution incident occur. ES Chapter 9 concludes that the Project's construction phase would result in a negligible effect which would be not significant with regards to contaminated land, minerals and hydrogeology. Likewise, the operational phase would result in no effects to Sites of Geological Importance and negligible effects to mineral sites. Therefore, there is no need to produce or implement a Geodiversity Management Strategy on the basis of no significant effects.
	Secretary of State decision making	
5.4.42 and 5.4.43	As a general principle, and subject to the specific policies below, development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives (as set out in Section 4.3 above). Where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought. If significant harm to biodiversity resulting from a development cannot be avoided (for example through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then the Secretary of State will give significant weight to any residual harm.	The Project has been designed following the mitigation hierarchy. At the routeing and siting stage, the Project design process was informed by the Holford and Horlock Rules to avoid impacts where possible. These established guidelines informed the evaluation criteria and how the mitigation hierarchy was applied during the options selection process. The adopted design approach is set out within ES Chapter 3: Alternatives (document reference 6.3) which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the application for development consent. The mitigation hierarchy is a key component of the Environmental Impact Assessment Process. ES Chapter 5: EIA Approach and Method (document reference 6.5) describes the mitigation hierarchy as a stepped process that helps development projects to address potentially adverse impacts on the environment. The mitigation hierarchy has been applied throughout development of the Project as part of the iterative EIA process which has informed the routeing and siting process. The Project has been designed to avoid, reduce or mitigate

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		potentially significant adverse residual effects. Key elements of the application of the mitigation hierarchy in respect of the Project include: • Sensitive routeing and siting of the alignment and Order Limits – as far as practicable, effects on identified environmental (including ecology) assets • The Outline CoCP (document reference 7.2) provides the preliminary framework for the principles and procedures that the Main Works Contractor(s) must implement to minimise, manage and mitigate the potential environmental impacts of construction works associated with the Project. The Outline CoCP is secured by Requirement 4 in the draft DCO (document reference 3.1). As reported in ES Chapter 8: Ecology and Biodiversity (document reference 6.8) the Project does not result in significant harm to biodiversity.
5.4.44	The Secretary of State should consider what appropriate requirements should be attached to any consent and/or in any planning obligations entered into, in order to ensure that any mitigation or biodiversity net gain measures, if offered, are delivered and maintained. Any habitat creation or enhancement delivered including linkages with existing habitats for compensation or biodiversity net gain should generally be maintained for a minimum period of 30 years, or for the lifetime of the project, if longer.	The Project has committed to deliver at least 10% BNG with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1). There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure Projects for which development consent is required, although this could change before the application is determined. National Grid's commitment to providing 10% BNG will be secured through a unilateral undertaking given under s.106 of the Town and Country Planning Act 1990. While every effort has been made to deliver the required BNG through replacement planting and on-site mitigation in the form of habitat creation and enhancement, given the scale and nature

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		of the Project, 10 % BNG is not fully achievable on-site. Off-site BNG is therefore proposed to make up any deficit. Biodiversity is not physically bound by planning authority boundaries and therefore a holistic approach is proposed for any off-site BNG, with the aim to deliver a biodiversity legacy ideally in each of the three counties crossed by the Project (Norfolk, Suffolk and Essex). Offsite BNG will be delivered through collaboration with partners and purchased from commercially registered providers. National Grid has been engaging in productive discussions with Norfolk, Suffolk and Essex Wildlife Trusts regarding the provision of off-site BNG units for the Project. National Grid has prepared draft Heads of Terms in relation to s106 Unilateral Undertaking.
5.4.45	The Secretary of State will need to take account of what mitigation measures may have been agreed between the applicant and the SNCB and the MMO/NRW (where appropriate). The Secretary of State will also need to consider whether the SNCB or the MMO/NRW has granted or refused, or intends to grant or refuse, any relevant licences, including protected species mitigation licences.	It is anticipated that protected species mitigation licences will be required for bats, great crested newts, otter, water vole, dormouse and badger. Embedded and good practice measures to avoid significant impacts on biodiversity are found in the Outline CoCP (document reference 7.2). Commitment B01 states that The Main Works Contractor(s) will comply with relevant protected species legislation. The commitments in the Outline CoCP will be secured by Requirement 4 in the draft DCO (document reference 3.1). Appropriate licences will be obtained where necessary from Natural England for all works affecting protected species as identified in the ES and through pre-construction surveys, these include project wide licenses for; bats, dormouse, otter, badgers and water vole. All applicable works will be undertaken in accordance with the relevant requirements and conditions set out in those licences. Where certain biodiversity receptors have been identified or where there is potential for them, and effects cannot be avoided during construction, Reasonable Avoidance Measures and/or

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		Precautionary Working Methods may also be developed and implemented under supervision by an ECoW. National Grid intend to obtain a Letter of No Impediment (LONI) from Natural England for the project wide licenses. A Great Crested Newt District License will also be obtained from Natural Grid. Appropriate mitigation measures have been discussed with Natural England. As such, see also the Draft Statement of Common Ground Natural England (document reference 5.9.14)
5.4.46 and 5.4.47	Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design. The Secretary of State should give appropriate weight to environmental and biodiversity enhancements, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited. When considering proposals, the Secretary of State should maximise such reasonable opportunities in and around developments, using requirements or planning obligations where appropriate. This can help towards delivering biodiversity net gain as part of or in addition to the approach set out at Section 4.6.	Whilst BNG is not required by the Environment Act 2021 at the present time, the Project will achieve a minimum of 10% Biodiversity Net Gain. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1). Furthermore, habitat removed during the construction will be reinstated (with the exception of planting restrictions associated with operational requirements as identified within the Outline LEMP (document reference 7.4).
5.4.48	In taking decisions, the Secretary of State should ensure that appropriate weight is attached to designated sites of international, national, and local importance; protected species; habitats and other species of principal importance for the conservation of biodiversity; and to biodiversity and geological interests within the wider environment.	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) details the likely significant effects of the Project with respect to biodiversity, including: internationally, nationally and locally designated sites; protected species and habitats; and other species identified as being of principal importance for the conservation of biodiversity. The chapter concludes that no residual significant adverse effects are predicted as a result of the construction and operation of the Project.

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	Secretary of State decision making – Habitats Regulations	
5.4.49	The Secretary of State must consider whether the project is likely to have a significant effect on a protected site which is part of the National Site Network (an habitat site), a protected marine site, or on any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans or projects.	The Project avoids and/ or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, during the construction and operation (including maintenance) phases.
	Secretary of State decision making – Sites of Special Scientific Interest (SSSIs)	
5.4.50	The Secretary of State should use requirements and/or planning obligations to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest.	An assessment of impacts of the Project during construction and operation (including maintenance) on designated sites including SSSIs is contained in ES Chapter 8: Ecology and Biodiversity (document reference 6.8). No significant adverse effects on any of these designations have been identified, taking into account mitigation set out in the Outline CoCP (document reference 7.2). The commitments in the Outline CoCP will be secured by Requirement 4 in the draft DCO (document reference 3.1).
	Secretary of State decision making – Regional and Local Sites	
5.4.52	The Secretary of State should give due consideration to regional or local designations. However, given the need for new nationally significant infrastructure, these designations should not be used in themselves to refuse development consent.	An assessment of impacts of the Project during construction and operation (including maintenance) on designated sites including regional and local designations is contained in ES Chapter 8: Ecology and Biodiversity (document reference 6.8) and ES Chapter 9 Contaminated Land, Geology and Hydrogeology (document reference 6.9). No significant adverse residual effects on any of these designations have been identified, taking into account mitigation. There are no Regional or Local Geological Sites affected by the Project.

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	Secretary of State decision making – Ancient woodland, ancient trees, veteran trees and other irreplaceable habitats	
5.4.53	The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.	Ancient Woodland The Project has been designed in a way which prioritises the retention and conservation of significant trees. Owing to the size of the Project it has not been possible to completely avoid the loss of such natural features therefore an Ancient Woodland and Veteran Tree Strategy (Appendix E to the Outline LEMP (document reference 7.4)) has been prepared to support the application for development consent. The Veteran Tree Strategy (Appendix E to the Outline LEMP (document reference 7.4)) notes that 51 blocks of ancient woodlands fall within 200 m of the Order Limits, of which 1.7 ha is falls within the Order Limits. All ancient woodland is set out within Table A8.1.6 of ES Appendix 8.1: Habitat Report and presented in ES Figure A8.1.3: Ancient Woodland Locations (both within document reference 6.8.A1). Of the 51 ancient woodlands within 200 m of the Project Order Limits, only four ancient woodlands (Round Wood, Rivenhall Thicks, Writtle-Writtlepark Woods and Clapgate Wood) have excavation works proposed within the 15 m buffer. All impacts are associated with unavoidable mitigation to third-party pre-existing assets required to facilitate the Project. A further six woodlands (Miller's Wood, Stonefield Strip LWS, Mann/Parson's Woods, Sheepcotes Wood, Botneyhill LWS and Little Bladen's Wood (LWS) have non-excavation construction work areas located within the 15 m ancient woodland buffer. Additional mitigation measures have been proposed for all ten of the above-mentioned ancient woodland parcels, to ensure no significant long term residual effects on ancient woodland are encountered as a result of the Project.

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		Where it is not possible to completely avoid impacts, the Project seeks to minimise impacts through design changes or modifications to working methodology. Standard mitigation measures, comprising management activities and techniques, would be implemented during construction of the Project to limit effects through adherence to good site practices and achieving legal compliance. The Outline CoCP (document reference 7.2) contains relevant standard / good practice mitigation measures relating specifically to landscape, ecology and biodiversity along with commitments made by National Grid. As stated in the Outline CoCP (document reference 7.2) the Project has committed to there being no physical works or breaking ground within 15 m of ancient woodland where at all practicable. Demarcation measures will be used to ensure this 15 m buffer is not breached. These embedded and standard mitigation measures are set out in the Outline LEMP (document reference 7.4) and the Ancient Woodland and Veteran Tree Strategy (Appendix E to the Outline LEMP (document reference 7.4)). In addition, the implementation of the Outline Dust Management Plan set out within the Outline CoCP (document reference 7.2) would ensure no negative effects on ancient woodland because of dust. In most cases, the above avoidance, embedded and standard mitigation measures are adequate to avoid impacts on to ancient woodland. However, where this is not the case, additional mitigation, comprising measures over and above any embedded and standard mitigation measures, are proposed to further reduce avoid significant environmental effects. Compensation is a last resort and is not currently proposed within this strategy.

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		As set out in the Outline CoCP (document reference 7.2) where sensitive features are to be retained (i.e., veteran, and mature trees, and Ancient Woodland), an appropriate protective area or protection mechanisms will be established using appropriate equipment or fencing and signage and will be inspected, repaired, and replaced as necessary. Veteran Trees The Arboricultural Impact Assessment (document reference 6.13.A6) concludes that a total of 112 trees and four groups have been surveyed within the Project Study Area as veterans. Four individual veteran trees require removal, while 15 veteran trees and two veteran groups require crown management. A full record of the identified veteran trees is included in Table 7.3 of the Outline LEMP (document 7.4). Appendix E: Veteran Tree and Ancient Woodland and Veteran Tree Strategy Mitigation Strategy of the Outline LEMP (document reference 7.4E) details the management outcomes and compensation strategy for veteran trees. Veteran trees to be removed will still provide essential habitats for the local flora and fauna. Where practical, after being felled, each tree should be laid as close to their original location as possible or near existing woodland to provide a deadwood habitat area. The material to be left should be as intact as is practicable.
	Secretary of State decision making – Protection and enhancement of habitats and species	
5.4.54	The Secretary of State should ensure that species and habitats identified as being of importance for the conservation of biodiversity are protected from the adverse effects of development by using requirements, planning obligations, or licence conditions where appropriate.	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) details the likely significant effects of the Project with respect to biodiversity, including: internationally, nationally and locally designated sites; protected species and habitats; and other species identified as being of principal importance for the conservation of biodiversity. The chapter concludes that no residual significant adverse effects are predicted as a result of the construction and operation of the Project.
5.4.55	The Secretary of State should refuse consent where harm to a protected species and relevant habitat would	

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	result, unless there is an overriding public interest and the other relevant legal tests are met. In this context the Secretary of State should give substantial weight to any such harm to the detriment of biodiversity features of national or regional importance or the climate resilience and the capacity of habitats to store carbon, which it considers may result from a proposed development.	Commitment B01 of the Outline CoCP (document reference 7.2) states that The Main Works Contractor(s) will comply with relevant protected species legislation. The commitments in the Outline CoCP will be secured by Requirement 4 in the draft DCO (document reference 3.1). Appropriate licences will be obtained where necessary from Natural England for all works affecting protected species as identified in the ES and through pre-construction surveys, these include project wide licenses for; bats, dormouse, otter, badgers and water vole. All applicable works will be undertaken in accordance with the relevant requirements and conditions set out in those licences. Where certain biodiversity receptors have been identified or where there is potential for them, and effects cannot be avoided during construction, Reasonable Avoidance Measures and/or Precautionary Working Methods may also be developed and implemented under supervision by an ECoW. National Grid intend to obtain a Letter of No Impediment (LONI) from Natural England for the project wide licenses. A Great Crested Newt District License will also be obtained from Natural Grid. To support the Secretary of State within its duties under the Conservation of Habitats and Species Regulations 2017 (as amended) and in accordance with planning policy, Habitats Regulations Assessment Report (document reference 5.3) presents the HRA undertaken for the Project, which comprises Stage 1: Screening and Stage 2: Appropriate Assessment. It builds on the Draft HRA Screening Report has concluded that there will be not significant adverse effects of the integrity of a European Site (following the implementation of mitigation). The Appropriate Assessment concluded there would be no significant adverse effects on the integrity of the Norfolk Valley Fens SAC and the Stour and Orwell Estuaries SPA and Ramsar Site with regard to hydrology once mitigation measures identified in the Outline CoCP (document reference 7.2) are employed secured through Requirement X 4 of the

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		draft DCO (document reference 3.1) are implemented. This includes direct and indirect (through FLL) effects at the Stour and Orwell Estuaries SPA and Ramsar Site.
5.5	**Civil and Military Aviation and Defence Interests**	
5.5.37	Where the proposed development may affect the performance of civil or military aviation CNS, meteorological radars and/or other defence assets an assessment of potential effects should be set out in the ES (see Section 4.3).	Consultation with National Air Traffic Services (NATS) Air Traffic Control (ATC) Safeguarding has confirmed that civil aviation CNS is not impacted by the Project. The Met Office has confirmed that meteorological radars are not significantly impacted by the Project. This is reported in ES Chapter 15: Socio-economics, Recreation and Tourism Appendix 15.2: Summary of Aviation Impact (document reference 6.15.2) which provides a summary of the potential impacts of the Project on aviation in accordance with national policy requirements and also sets out National Grid's consultation efforts with aviation stakeholders. Details of engagement with the MOD and DIO is reported in Summary of Aviation Impact (document reference 6.15.2) and the Planning Statement (document reference 5.6).
5.3.39	The applicant should consult the MOD, Met Office, Civil Aviation Authority (CAA), NATS and any aerodrome – licensed or otherwise – likely to be affected by the proposed development in preparing an assessment of the proposal on aviation, meteorological or other defence interests.	As set out in Appendix 15.2: Summary of Aviation Impact (document reference 6.15.2) National Grid has consulted the MOD, Met Office, CAA and NATS as well as owners and operators of aerodromes likely to be affected by the Project. This has included 17 unlicensed civil aerodromes, a military aerodrome and a model aircraft aerodrome identified as located within 5 km of the Project Alignment and assessed to be potentially affected by the proposed development as result of their proximity to Project infrastructure. Consultation has also been undertaken with a licensed civil aerodrome which, whilst located beyond 5 km of the Project Alignment, has a defined safeguarding area infringed by the Alignment.
5.5.40	Any assessment of effects on aviation, meteorological or other defence interests should include potential	National Grid appointed an independent aviation consultancy to assist with consideration of potential interactions with flying

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	impacts of the Project upon the operation of CNS infrastructure, flight patterns (both civil and military), generation of weather warnings and forecasts, other defence assets (including radar) and aerodrome operational procedures. It should also assess the demonstratable cumulative effects of the Project with other relevant projects in relation to aviation, meteorological and defence.	activities. Aviation interests identified have included a variety of aircraft types, gliders, hot air ballooning, military, civilian and emergency services helicopters, as well as model aircraft. National Grid's Aviation Impact Assessments Appendix 15.2: Summary of Aviation Impact (document reference 6.15.2) have enabled risk-based site-specific impact assessments for civil aerodromes potentially impacted by the Project. Their primary function is to evaluate risks of collision, predominantly during take-off and approaches and including forced landing risks, with the proposed overhead line alignment representing a new obstacle within proximity of aerodromes. Operational and safety impacts arising from potential increases to risks of bird strike, wind turbulence and electromagnetic forces as a result of the Project are also considered. The methodology enables a bespoke appraisal, appropriate to each aerodrome, that considers a range of factors in addition to the height and location of the proposed overhead line alignment, including: runway length and orientation in relation to the overhead line; aircraft types, performance, flight paths and operational procedures (determined from published information, as well as via consultation with operators and relevant aviation stakeholders); and the surrounding context in terms of topography, existing obstacles (including other overhead lines, considering cumulative effects) and neighbouring aerodromes. The assessments include consideration of whether the Project alignment infringes Obstacle Limitation Surfaces (OLS) as specified under the CAA's CAP 168 regulations for licensed aerodromes, recognising this to be a best practice measure for obstacle assessment and treatment, albeit not a regulatory requirement for unlicensed aerodromes. If CAP168 measures are met, the proposed overhead line alignment is considered to have an acceptable impact on the aerodrome's operations and

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		no further design changes are considered likely to be necessary. National Grid recognises, however, that aerodrome operators, with responsibility for safeguarding, will review the possibility of agreeing reasonable changes to operational procedures. The work to consider the impact on aviation identify Chase Farm Aerodrome as the only site significantly impacted by the Project. Here, the Project may preclude the use of the airfield. The Project has been realigned to lessen impact, and it is not possible due to constraints to re-align it any further. National Grid is collaborating with the MOD to inform the Stakeholder's own assessment of the potential effects of the Project on military aviation, technical assets and other defence interests. National Grid has consulted NATS who have undertaken their own assessment and confirmed that civil aviation CNS is not impacted by the Project. This is evidenced in ES Chapter 15: Socio-economics, Recreation and Tourism Appendix 15.2: Summary of Aviation Impact (document reference 6.15.2). National Grid has consulted the Met Office who have undertaken their own assessment and confirmed that weather-related radar will not be significantly impacted by the Project.
5.5.41	In addition, consideration of developments near aerodromes should take into account the following factors: • Bird Strike Risk - Aircraft are vulnerable to wildlife strike, in particular bird strike. Birds and other wildlife may be attracted to the vicinity of an aerodrome by various types of development, for example, large buildings with perching/roosting opportunities for birds. It is therefore important that infrastructure, buildings and other elements from energy	As described at 5.5.40, National Grid's Aviation Impact Assessments Appendix 15.2: Summary of Aviation Impact (document reference 6.15.2) take into account factors including bird strike risk and building induced turbulence. Thermal Plume Turbulence is not considered to be a relevant factor to the Project. ES Chapter 15: Socio-economics, Recreation and Tourism Appendix 15.2: Summary of Aviation Impact (document reference 6.15.2) details National Grid's engagement efforts with local gliding groups who may be impacted by the Project. Out of the glider stakeholders consulted only Tibenham Aerodrome raised concerns around

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	installations, as well as environmental mitigation are designed in such a way so as not to increase the bird strike risk to the airport for developments within 13km (this can vary). • Building Induced Turbulence - If a significant building or structure is proposed close to the airport/runways, there is potential for building induced turbulence/wind shear to be created which has the potential to impact on aircraft on take-off and landing. Studies may be required to identify the extent of any turbulence resulting from the energy infrastructure. • Thermal Plume Turbulence - This is caused under certain conditions by the release of hot air from a power plant equipped with a dry cooling system. The plumes generated by these facilities have the potential to create invisible turbulence that can affect the manoeuvrability of aircraft.	operational impacts. National Grid has sought to engage further with Tibenham Aerodrome to minimise operational impacts. In relation to bird strike risk, Appendix 15.2: Summary of Aviation Impact (document reference 6.15.2) considers that the bird species of greatest risk are larger wetland species such swans, geese, ducks and waders. The Project overhead line alignment is not assessed likely to attract greater numbers of these species as they are not species that will roost or nest on the lines or pylons. Furthermore, wetland creation is not proposed within the Project. No significant change in the current baseline numbers of these species is expected as a result. Bird species such as pigeons, corvids, starlings (and other passerines / near-passerines) will roost on the lines, sometimes in large flocks. It is assessed that the OHL will not draw these birds in from a wider area, rather provide an alternative roost site. Therefore, no change in the current baseline numbers of these birds is expected. It is recognised that occasional bird of prey could nest on pylons, and so the proposed pylons may attract these birds to the area as they provide a nesting opportunity that would otherwise be absent. However, nesting raptors have fairly big territories and so large numbers of birds won't be attracted, just the occasional breeding pair. The likelihood of an aircraft bird strike as a result of the Project overhead line alignment is assessed to be very low, for the reasons given. Mitigation of residual risk is achievable for aerodrome operators who have residual concerns. It is not assessed that the Project overhead line alignment will increase the risk of wind turbulence for aircraft on approach or departure from any of the potentially affected aerodromes. Buildings at or near airfields can, in certain circumstances,

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		produce wind turbulence which can impact on flight operations, particularly for smaller aircraft types. At the airfields assessed, however, the overhead line would be at a sufficient distance from the flight paths and the structural nature and surfaces of the overhead line infrastructure including pylons are such that wind vortices would not be generated that could impose a threat to aircraft safety.
5.4.42	If any relevant changes are made to proposals during the pre-application and determination period, it is the responsibility of the applicant to ensure that the relevant aviation, meteorological and defence consultees are informed as soon as reasonably possible.	To date, during the pre-application period, National Grid has informed relevant stakeholders of changes to the Project proposals via engagement within and in addition to the non-statutory and statutory consultation periods. National Grid considers its engagement to have been timely whilst allowing feedback and proposed changes from stakeholders to be appropriately considered.
	Mitigation	
5.5.43	The applicant should include appropriate mitigation measures as an integral part of the proposed development.	National Grid's integrated Project development process has ensured feedback from aviation stakeholders as well as from the conclusions of Aviation Impact Assessments have informed development of the Project design to mitigate risk to aviation safety and operations. This has involved the consideration of design changes such as potential amendments to the location and scale (height) of Project infrastructure to reduce impacts associated with its proximity to aerodromes. The process has resulted in the implementation of changes to both the orientation and location of the Project overhead line alignment in several instances to minimise risks.
5.5.44	Mitigation for infringement of OLS may include: • agreed changes to operational procedures of the aerodromes in accordance with relevant guidance, provided that safety assurances can be provided by the operator that are acceptable to the CAA where the changes are proposed to a civilian aerodrome	As described at 5.5.40, National Grid's Aviation Impact Assessments assess the extent to which OLSs are infringed, amongst other factors. Where minor infringements are assessed to be likely to occur, consultation with aviation stakeholders has involved consideration of reasonable changes to aerodrome operational procedures as well as other

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	(and provided that it does not result in an unreasonable reduction of capacity or unreasonable constraints on the operation of the aerodrome against pre-COVID-19 levels); or • installation of obstacle lighting and/or by notification in Aeronautical Information Service publications	mitigation measures, including the future publication of Project infrastructure information for aviation charting purposes. Measures such as marker balls and obstacle lighting are recognised within assessments but are not recommended as appropriate mitigations for any of the aerodromes in scope. National Grid continues to engage with aerodrome owners and operators to agree acceptable operational changes, recognising for the General Aviation civilian aerodromes potentially affected by the Project responsibilities for safeguarding lie with the operator (as stated in Paragraph. 5.5.16). SoCGs have been prepared with the following: • Barnards Farm Airfield SoCG (document reference 5.9.22) • Brook Farm Airfield SoCG (document reference 5.9.32) • Thurrock Airfield SoCG (document reference 5.9.23) • National Grid is developing Statements of Common Ground with both the DIO and WFS, which it intends to submit during Examination.
5.5.45	For CNS infrastructure, the UK military Low Flying system (including TTAs) and designated air traffic routes, mitigation may also include: • operational airspace changes • agreement to upgrade CNS infrastructure, the cost of which the applicant may reasonably be required to contribute in part or in full until the end of the life of the surveillance equipment if subsequently replaced by a fully windfarm tolerant system. If an appropriate system upgrade cannot be identified at the point of application, the applicant may be required to contribute in part or in full to any future upgrade for the lifetime of the wind farm. Costs should be reflective of need and impact of the energy installation on the monitoring equipment	As per 5.5.37, consultation with the MOD DIO is ongoing. This is inclusive of the assessment of potential Project impacts on the UK military Low Flying system and well as technical assets, and the implementation of associated mitigations. National Grid is developing Statements of Common Ground with both the DIO and WFS, which it intends to submit during Examination.

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	• introducing radar mitigation technology to the development, e.g. by using non-radar reflecting materials to manufacture wind turbine blades	
5.5.46	Mitigation for effects on meteorological radar and CNS systems may include reducing the scale of a Project, although it is likely to be unreasonable for the Secretary of State to require mitigation by way of a reduction or alteration in the scale of development.	See 5.5.45 above in relation to military technical assets. Consultation with the Met Office identified that the Project would infringe the safeguarding zone of a meteorological radar (under construction). Subsequent engagement has confirmed that the Project will not significantly impact the radar, and that design modifications to reduce the scale of the Project are not required.
	Secretary of State decision making	
5.5.49	The Secretary of State should be satisfied that the effects on meteorological radars, civil and military aerodromes, aviation technical sites and other defence assets or operations have been addressed by the applicant and that any necessary assessment of the proposal on aviation, NSWWS or defence interests has been carried out.	National Grid's approach has addressed the potential effects of the Project through consultation with relevant stakeholders, its direct assessment of civil aviation impacts relating to aerodromes, its support to the MOD's assessment of military aviation and defence asset impacts as well as Met Office's assessment of impacts to meteorological radar. Feedback from stakeholders and the conclusions of impact assessments has informed the development of the Project design to minimise adverse impacts, as appropriate. As per 5.5.37, consultation with NATS has confirmed that civil aviation CNS is not impacted by the Project.
5.5.50	In particular, the Secretary of State should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes and that realistically achievable mitigation is carried out on existing surveillance systems such as radar/tracking technologies. It is incumbent on Operators of aerodromes to regularly review the possibility of agreeing to make reasonable changes to operational procedures.	As described at 5.5.43, National Grid's design development approach has enabled evolution of the Project design to minimise adverse impacts for civil aviation aerodromes within scope, where possible. Engagement with aerodrome operators is ongoing to seek confirmation of the acceptability of the Project Alignment via Statements of Common Ground (SOCG) and Stakeholder Agreements, where considered necessary. SoCGs have been prepared with the following: • Barnards Farm Airfield SoCG (document reference 5.9.22)

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		• Brook Farm Airfield SoCG (document reference 5.9.32) • Thurrock Airfield SoCG (document reference 5.9.23) In addition, the SOCG process enables collaborative review and agreement of possible changes to operational procedures by Operators, where considered to be reasonable. Stakeholder Agreements capture where General Aviation operators consider that the Project design and any associated or alternative mitigations (including reasonable changes to operational procedures) do not reduce residual safety or operational risks to an acceptable level from their safeguarding perspective. In relation to military aerodromes, National Grid is developing Statements of Common Ground with both the DIO and WFS, which it intends to submit during Examination. In relation to meteorological radar, the Met Office has confirmed that potential impacts will be small, resulting in some loss of rainfall signal data, but that this impact was assessed to be manageable.
5.5.51	When assessing the necessity, acceptability, and reasonableness of operational changes to aerodromes, the Secretary of State should be satisfied that they have the necessary information regarding the operational procedures along with any demonstrable risks or harm of such changes, taking into account the cases put forward by all parties. When making such a judgement in the case of military aerodromes, the Secretary of State should have regard to interests of defence and national security.	As described at 5.5.39, National Grid's Aviation Impact Assessments for civil aerodromes follow a methodology that considers multiple factors, including site-specific operational information such as aircraft types, performance, flight paths and operational procedures determined from published information, as well as via consultation with Operators and relevant aviation stakeholders. The Assessment conclusions focus on safety and operation risks. National Grid recognises the need to work collaboratively with the MOD in the undertaking of impact assessments for military aerodromes, responding to limitations to the sharing and publication of information relating to military assets, in the interests of defence and national security.

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5.5.58	Where a proposed energy infrastructure development would significantly impede or compromise the safe and effective use of civil or military aviation, meteorological radars, defence assets and/or significantly limit military training, the Secretary of State may consider the use of 'Grampian conditions', or other forms of requirement which relate to the use of current or future technological solutions, to mitigate impacts on legacy CNS equipment.	As per 5.5.45, National Grid recognises the potential requirement for use of a Grampian condition, or similar, to ensure mitigation of potential impacts on the UK military Low Flying system.
5.5.59	Where, after reasonable mitigation, operational changes, obligations and requirements have been proposed, the Secretary of State should consider whether: • a development would prevent a licensed aerodrome from maintaining its licence and the operational loss of the said aerodrome would have impacts on national security and defence, or result in substantial local/national economic loss, or emergency service needs • it would cause harm to aerodromes' training or emergency service needs • the development would impede or compromise the safe and effective use of defence assets or unacceptably limit military training • the development would have a negative impact on the safe and efficient provision of en-route air traffic control services for civil aviation, in particular through an adverse effect on CNS infrastructure • the development would compromise the effective provision of weather warnings by the NSWWS, or flood warnings by the UK's flood agencies	National Grid does not assess that the Project will impact licensed aerodromes, nor cause harm to civil aerodromes' training or emergency services' needs, nor have a negative impact on civil aviation air traffic control services. As described at 5.5.37 and 5.5.40 the potential for the Project to impede or compromise the safe and effective use of defence assets or unacceptably limit military training is subject to ongoing assessment by the MOD. It is anticipated that risk can be minimised by reasonable mitigation and/or appropriate obligations or requirements. As per 5.5.50, the Met Office does not consider that the Project would compromise the effective provision of weather warnings by the NSWWS.

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5.7. Dust, Odour, Artificial Light, Smoke, Steam, and Insect Infestation		
5.7.1	During the construction, operation and decommissioning of energy infrastructure there is potential for the release of a range of emissions such as odour, dust, steam, smoke, artificial light and infestation of insects. All have the potential to have a detrimental impact on amenity or cause a common law nuisance or statutory nuisance under Part III, Environmental Protection Act 1990. However, they are not regulated by the environmental permitting regime, so mitigation of these impacts will need to be included in the Development Consent Order.	The Statement of Statutory Nuisance (document reference 5.4) identifies the matters set out in Section 79(1) of the EPA 1990 in respect of statutory nuisance and considers whether the Project has the potential to cause nuisance. The Statement of Statutory Nuisance concludes that with the good practice measures in place, that there are no likely nuisances, including dust, odour, artificial light, smoke or insect infestation, anticipated on the Project. The scope of assessment for insect infestation and emissions of odour, dust, steam, smoke and artificial light; National Grid published the EIA Scoping Report (document reference 6.19) in 2021 which set out the proposed scope of the assessment including on air quality (dust) and landscape (artificial light). Further details on the responses received on the Scoping Report can be found in the Scoping Opinion (document reference 6.20) and ES Appendix 5.1: National Grid's response to the EIA Scoping Opinion (document reference 6.5.A1).
5.7.3	Because of the potential effects of these emissions and infestation, and in view of the availability of the defence of statutory authority against nuisance claims described in Section 4.15, it is important that the potential for these impacts is considered by the applicant and Secretary of State.	Noted
5.7.4	For energy NSIPs of the type covered by this NPS, some impact on amenity for local communities is likely to be unavoidable. The aim should be to keep impacts to a minimum, and at a level that is acceptable.	On the assumption that all mitigation is in place during construction and operation the Project will not result in significant effects on amenity. This is evidenced in ES Chapter 7: Air Quality (document reference 6.7) which considers impacts from dust, odour, smoke and steam and ES Chapter 14: Noise and Vibration (document reference 6.14) which considers noise and vibration, and ES Chapter 13: Landscape and Visual (document reference 6.13) assesses the likely

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		significant effects of the Project in relation to lighting during construction on landscape and visual receptors. The Outline CoCP (document reference 7.2) sets out the good practice measures to protect the amenity for surrounding environments during construction and operation. Key measures include directional and minimised construction lighting (LV03), locating potentially disruptive activities and equipment away from sensitive receptors like residential areas where practicable (GG22), designing permanent lighting to minimise impacts on adjacent properties (GG31), and ensuring construction lighting is switched off when not in use and positioned to avoid spillover onto nearby land (B06).
	Applicant assessment	
5.7.5	The applicant should assess the potential for insect infestation and emissions of odour, dust, steam, smoke, and artificial light to have a detrimental impact on amenity, as part of the ES.	In accordance with Paragraph 5.6.6 of EN-1, in relation to the scope of assessment for insect infestation and emissions of odour, dust, steam, smoke and artificial light; National Grid published the EIA Scoping Report (document reference 6.19) in 2021 which set out the proposed scope of the assessment including on air quality (dust) and landscape (artificial light). Further details on the responses received on the Scoping Report can be found in the Scoping Opinion (document reference 6.20) and ES Appendix 5.1: National Grid's response to the EIA Scoping Opinion (document reference 6.5.A1). No significant effects in respect to odour, dust, steam, smoke and artificial light are expected during the operational phase of the Project. As described in ES Chapter 7: Air Quality (document reference 6.7), during the construction phase, construction machinery and vehicles could generate dust and fine particulate matter, particularly through earthwork and soil stripping activities. Machinery and vehicles would also emit exhaust emissions through the combustion of fossil fuels. There is limited potential for the Project to generate dust and emissions during the operational phase, due to the limited

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		activities associated with inspection and maintenance therefore this has been scoped out of the assessment. A dust risk assessment has been undertaken and is reported in ES Appendix 7.3: Air Quality Assessment Results (document reference 6.7.A3). The impact of light pollution is assessed ES Chapter 8: Ecology and Biodiversity (document reference 6.8) and ES Chapter 13: Landscape and Visual (document reference 6.13) which present the assessment of likely significant ecology and biodiversity, and landscape and visual effects that could result from the Project including lighting impacts. The Outline CoCP (document reference 7.2) sets out the good practice measures to protect Ecology, Biodiversity, and Landscape and Visual environments during construction and operation. Key measures include directional and minimised construction lighting (LV03), locating potentially disruptive activities and equipment away from sensitive receptors like residential areas and ecological sites where practicable (GG22), designing permanent lighting to minimise impacts on adjacent properties, protected species, and habitats (GG31), and ensuring construction lighting is switched off when not in use and positioned to avoid spillover onto nearby land or vegetation (B06). During construction, the Project would comply with the good practice measures outlined within Table 6.1 of the Outline CoCP (document reference 7.2) to reduce the potential for adverse impacts due to the release of emissions (commitment AQ01, AQ02 and S01) or insect infestation (commitment GG23). For example, in accordance with commitment GG23 within the Outline CoCP (document reference 7.2) site layout and housekeeping measures would be implemented by the contractor during the set-up of the temporary compounds preventing pests and vermin control, and treating any

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		infestation promptly, including arrangements for the proper storage and disposal of waste produced on site. The Statement of Statutory Nuisance (document reference 5.4) identifies the matters set out in Section 79(1) of the EPA 1990 in respect of statutory nuisance and considers whether the Project has the potential to cause nuisance. The Outline CoCP (document reference 7.2) include good practice measures to avoid or reduce the effects of dust, lighting, noise and vibration. These measures would reduce impacts that could otherwise result in nuisance during construction. The development authorised by the DCO must be undertaken in accordance with the CoCP, pursuant to Requirement 4 of the draft DCO (document reference 3.1). National Grid and their contractor would carry out all work in accordance with the CoCP during the construction of the Project unless otherwise agreed with the relevant planning authority. With the good practice measures in place, no breach of Section 79(1) of the EPA 1990 is expected as a result of the Project.
5.7.6	In particular, the assessment provided by the applicant should describe: • the type, quantity and timing of emissions • aspects of the development which may give rise to emissions • premises or locations that may be affected by the emissions • effects of the emission on identified premises or locations • measures to be employed in preventing or mitigating the emissions	No residual significant effects in respect to emissions during operation of the Project are expected. As described in ES Chapter 7: Air Quality (document reference 6.7) during the construction phase, construction machinery and vehicles could generate dust and fine particulate matter, particularly through earthwork and soil stripping activities. Machinery and vehicles would also emit exhaust emissions through the combustion of fossil fuels. A dust risk assessment has been undertaken and is reported in ES Appendix 7.3: Air Quality Assessment Results (document reference 6.7.A3). During construction, the Project would comply with the good practice measures within the Outline CoCP (document reference 7.2) to reduce the potential for adverse impacts due to the release of emissions

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		or infestation. In addition, a statement of statutory nuisance has been undertaken. The Statement of Statutory Nuisance (document reference 5.4) concludes that with the good practice measures identified in the Outline CoCP (document reference 7.2), no breach of Section 79(1) of the EPA 1990 is expected as a result of the Project.
	Mitigation	
5.7.8	Mitigation measures may include one or more of the following: • engineering: prevention of a specific emission at the point of generation; control, containment and abatement of emissions if generated • lay-out: adequate distance between source and sensitive receptors; reduced transport or handling of material • administrative: limiting operating times; restricting activities allowed on the site; implementing management plans	During construction, the Project would comply with the good practice measures within the Outline CoCP (document reference 7.2) to reduce the potential for adverse impacts due to the release of emissions or infestation. These include control measures such as turning off machinery when not in use (AQ01), layout measures such as locating equipment away from sensitive receptors where practicable (GG22) and the implementation of management plans (AQ01).
5.7.9	Construction should be undertaken in a way that reduces emissions, for example the use of low emission mobile plant during the construction, and demolition phases as appropriate, and consideration should be given to making these mandatory in Development Consent Order requirements.	National Grid has identified a number of good practice measures, which generally comprise measures imposed through legislative requirements or represent standard sector good practices. These include GG24 of the Outline CoCP (document reference 7.2), which states: Plant and construction vehicles (not including construction worker private vehicles) will conform to relevant applicable standards for the vehicle type which will have been defined in the Outline CoCP. Vehicles will be correctly maintained and operated in accordance with manufacturer's recommendations and in a responsible manner. All plant and vehicles will be required to switch off their engines when not in use and when it is safe to do so.

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		The CoCP is secured by Requirement 4 of Schedule 3 of the draft DCO (document reference 3.1).
5.7.10	Demolition considerations should be embedded into designs at the outset to enable demolition techniques to be adopted that remove the need for explosive demolition.	Section 1.11 of ES Chapter 4: Project Description (document reference 6.4) considers decommissioning of the Project and concludes that there are currently no specific plans to decommission the Project. It is expected that the transmission of electricity would continue for as long as there is a business case for doing so and that any decommissioning activity would occur decades into the future. The pylons comprise open, lattice structures which can be easily dismantled. It is expected that proposals for decommissioning would be subject to separate consenting procedures, including environmental assessment of the proposed activities, and taking account of the baseline as it exists at the time of decommissioning. The infrastructure proposed as part of the Project would comprise of overhead line, underground cables and substations all of which do not require explosive demolition in the event of decommissioning – as per Table 4.11 in ES Chapter 4: Project Description (document reference 6.4).
5.7.11	A construction management plan may help clarify and secure mitigation	National Grid has produced an Outline CoCP (document reference 7.2) which sets out the required mitigation measures and environmental commitments that will be implemented during the construction phase of the Project. The commitments would be secured by Requirement 4 of Schedule 3 in the draft DCO (document reference 3.1).
	Secretary of State decision making	
5.7.12	The Secretary of State should satisfy itself that: • an assessment of the potential for artificial light, dust, odour, smoke, steam and insect infestation to have a detrimental impact on amenity has been carried out	See responses to 5.7.5

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	• that all reasonable steps have been taken, and will be taken, to minimise any such detrimental impacts	
5.8	**Flood Risk**	
5.8.3	The government's Flood and Coastal Erosion Risk Management Policy Statement sets out our ambition to create a nation more resilient to future flood and coastal erosion risk. It outlines policies and actions which will accelerate progress to better protect and better prepare the country against flooding and coastal erosion. The industry should consider any updates to government policy and apply updated approaches as a matter of priority.	The FRA (document reference 7.9) has been submitted as part of the application for development consent focussing on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. As detailed within the FRA flooding from other sources such as sewers, reservoirs and other artificial sources are scoped out of the assessment. National Grid also circulated a draft version of the FRA to the Environment Agency, IDB and LLFA ahead of the submission of the application for development consent for their consideration and comment. Subsequently, the consultees' feedback was taken into consideration whilst preparing the submission version of the FRA. A Draft Statement of Common Ground with the Environment Agency (document reference 5.9.16) has been produced.
5.8.4	All buildings in flood risk areas can improve their preparedness to reduce costs and disruption to key public services when a flood happens. Where infrastructure is not better protected as part of a wider community scale flood defence scheme, those who own and run infrastructure sites – whether in public or private hands – are expected to take action to keep water out, minimise the damage if water gets in through flood-resilient materials, and reduce the disruption caused. This includes effective contingency planning to mitigate the impacts of flooding on the delivery of important services.	All of the proposed new substations and extensions to existing substations are located in Flood Zone 1. Six of the proposed CSE compounds are located in Flood Zone 1. The CSE compound site at Wenham Grove is partially situated in Flood Zone 3 following the release of updated flood mapping dataset from the Environment Agency. This CSE compound would be laid out in accordance with the sequential approach, whereby the most vulnerable components are located in areas at lowest risk of flooding. The requirements for compensation of loss of floodplain storage associated with the pylons is addressed in the following sub-section and secured by commitment W17 in the Outline CoCP (document reference 7.2). No discernible loss of floodplain storage is associated with the CSE compound, associated above ground infrastructure has a very limited footprint.

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		The FRA (document reference 7.9) has concluded that the Project during its construction would be generally at low risk of flooding from rivers. Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures set out in the Outline CoCP (document reference 7.2). These measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk as set out in ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12). During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the FRA. Above ground structures such as pylons and below ground structures such as the underground cable are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement.
5.8.5	Climate change is already having an impact and is expected to have an increasing impact on the UK throughout this century. The UK Climate Projections 2018 show an increased chance of milder, wetter winters and hotter, drier summers in the UK, with more intensive rainfall causing flooding. Sea levels will continue to rise beyond the end of the century, increasing risks to vulnerable coastal communities. Within the lifetime of energy projects, these factors will lead to increased flood risks in areas susceptible to flooding, and to an increased risk of the occurrence of floods in some areas which are not currently thought of as being at risk. A robust approach to flood risk	See response to 4.10.3

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	management is a vital element of climate change adaptation; the applicant and the Secretary of State should take account of the policy on climate change adaptation in Section 4.10.	
5.8.9	If, following application of the Sequential Test, it is not possible, (taking into account wider sustainable development objectives), for the Project to be located in areas of lower flood risk the Exception Test can be applied as defined in https://www.gov.uk/guidance/flood-risk-and-coastal-change#table2. The test provides a method of allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available.	The Flood Risk Assessment (document reference 7.9) demonstrates that the majority of the Project lies within Flood Zone 1 and in zones that are at low risk of flooding from other sources. This has been achieved through an iterative process of design informed by detailed routeing and siting studies and stakeholder feedback. However, given the linear nature of the Project and its large geographical scale, avoidance of all areas of fluvial floodplain and areas at risk of surface water flooding is not practicable and therefore no suitable alternative sites are available for the parts of the Project in higher flood risk areas. Works in these areas however are largely temporary, associated with construction of the Project, and during its operation (and maintenance) are limited to a small number of pylons in the fluvial floodplain (that are of low vulnerability to inundation) and areas at risk of surface water flooding on some localised reaches of permanent routes of access. The Exception Test is therefore triggered and this is reported below.
5.8.10 and 5.8.11	The Exception Test is only appropriate for use where the Sequential Test alone cannot deliver an acceptable site. It would only be appropriate to move onto the Exception Test when the Sequential Test has identified reasonably available, lower risk sites appropriate for the proposed development where, accounting for wider sustainable development objectives, application of relevant policies would provide a clear reason for refusing development in any alternative locations identified. Examples could include alternative site(s) that	To satisfy planning requirements, an Exception Test is required to prove: • The development provides wider sustainability benefits to the community, that outweigh flood risk • The development will be safe for its lifetime, taking account of the vulnerability of its users, without increasing flood risk overall. An exception test has been produced, and this is presented in the FRA (document reference 7.9). In response to the first part

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	are subject to national designations such as landscape, heritage and nature conservation designations, for example Areas of Outstanding Natural Beauty (AONBs), SSSIs and World Heritage Sites (WHS) which would not usually be considered appropriate. Both elements of the Exception Test will have to be satisfied for development to be consented. To pass the Exception Test it should be demonstrated that: • the Project would provide wider sustainability benefits to the community that outweigh flood risk; and • the Project will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall.	of the Exception Test the need for the Project is explained in the Strategic Options Backcheck Report (document reference 7.17) and summarised in Chapter 4 of this Planning Statement. With regard to the first part of the test, the Project is Nationally Significant Infrastructure Project that would play an important role in delivering renewable electricity, reliably and safely and will support the UK's move towards net zero. The Project is identified as low carbon infrastructure which is of CNP Infrastructure. With regard to the second test, the permanent works associated with the Project which are within Flood Zone 3 are restricted to a small number of pylons for the overhead lines and a partial area of the Little Wenham CSE compound. These elements would be designed such that they are resilient to flooding, ensuring the Project would be safe and could continue to operate during flood event. A suite of measures would be adopted to prevent flood risk increases during construction and operation of the Project. Temporary worksites in floodplains would operate in accordance with the protocols detailed in a Flood Warning and Evacuation Plan (Appendix G of the Outline CoCP (document reference 7.2), to safeguard construction personnel and prevent flood damage to construction equipment and materials.
5.8.12	Development should be designed to ensure there is no increase in flood risk elsewhere, accounting for the predicted impacts of climate change throughout the lifetime of the development. There should be no net loss of floodplain storage and any deflection or constriction of flood flow routes should be safely managed within the site. Mitigation measures should make as much use as possible of natural flood management techniques.	See response to 5.8.4

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	Applicant assessment	
5.8.13	A site-specific flood risk assessment should be provided for all energy Projects in Flood Zones 2 and 3 in England or Zones B and C in Wales. In Flood Zone 1 in England or Zone A in Wales, an assessment should accompany all proposals involving: • sites of 1 hectare or more • land which has been identified by the EA or NRW as having critical drainage problems • land identified (for example in a local authority strategic flood risk assessment) as being at increased flood risk in future • land that may be subject to other sources of flooding (for example surface water) • where the EA or NRW, Lead Local Flood Authority, Internal Drainage Board or other body have indicated that there may be drainage problems.	A proportionate FRA (document reference 7.9) has been prepared to support the DCO application. The FRA assesses sources of flooding from rivers and the sea, surface water and groundwater; flooding from sewers/water mains and reservoirs were scoped out of the assessment. It documents the assessment undertaken to understand whether the Project is likely to be at risk of flooding or is likely to increase flood risk elsewhere in accordance with the requirements set out in Paragraph 5.8.14.
5.8.14	This assessment should identify and assess the risks of all forms of flooding to and from the Project and demonstrate how these flood risks will be managed, taking climate change into account.	The Project has prepared a proportionate FRA (document reference 7.9). The FRA assesses all relevant forms of flooding, although flooding from sewers, reservoirs and other artificial sources are scoped out of the assessment. A draft version of the FRA to the Environment Agency, IDB and LLFA ahead of the submission of the application for development consent for their consideration and comment. Subsequently, the consultees' feedback was taken into consideration whilst preparing the submission version of the FRA. The FRA demonstrates that the Project is acceptable with respect to flood risk and the flood risk management measures identified would be secured through the Outline CoCP

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		(document reference 7.2) and Requirement 5 of the draft DCO (document reference 3.1).
5.8.15	The minimum requirements for Flood Risk Assessments (FRA) are that they should: • be proportionate to the risk and appropriate to the scale, nature and location of the project; • consider the risk of flooding arising from the project in addition to the risk of flooding to the project; take the impacts of climate change into account, across a range of climate scenarios, clearly stating the development lifetime over which the assessment has been made; • be undertaken by competent people, as early as possible in the process of preparing the proposal; • consider both the potential adverse and beneficial effects of flood risk management infrastructure, including raised defences, flow channels, flood storage areas and other artificial features, together with the consequences of their failure and exceedance; • consider the vulnerability of those using the site, including arrangements for safe access and escape; • consider and quantify the different types of flooding (whether from natural and human sources and including joint and cumulative effects) and include information on flood likelihood, speed-of-onset, depth, velocity, hazard and duration; • identify and secure opportunities to reduce the causes and impacts of flooding overall, making as much use as possible of natural flood management	The Project has prepared a proportionate FRA (document reference 7.9). The FRA assesses all relevant forms of flooding, although flooding from sewers, reservoirs and other artificial sources are scoped out of the assessment. A draft version of the FRA to the Environment Agency, IDB and LLFA ahead of the submission of the application for development consent for their consideration and comment. Subsequently, the consultees' feedback was taken into consideration whilst preparing the submission version of the FRA. The FRA demonstrates that the Project is acceptable with respect to flood risk and the flood risk management measures identified would be secured through the Outline CoCP (document reference 7.2) and Requirement 4 of Schedule 3 of the draft DCO (document reference 3.1).

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	techniques as part of an integrated approach to flood risk management; • consider the effects of a range of flooding events including extreme events on people, property, the natural and historic environment and river and coastal processes; • include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been taken into account and demonstrate that these risks can be safely managed, ensuring people will not be exposed to hazardous flooding; • consider how the ability of water to soak into the ground may change with development, along with how the proposed layout of the Project may affect drainage systems. Information should include: i. Describe the existing surface water drainage arrangements for the site ii. Set out (approximately) the existing rates and volumes of surface water run-off generated by the site. Detail the proposals for restricting discharge rates iii. Set out proposals for managing and discharging surface water from the site using sustainable drainage systems and accounting for the predicted impacts of climate change. If sustainable drainage systems have been rejected, present clear evidence of why their inclusion would be inappropriate. iv. Demonstrate how the hierarchy of drainage options has been followed.219	

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	v. Explain and justify why the types of SuDS220 and method of discharge have been selected and why they are considered appropriate. vi. Explain how sustainable drainage systems have been integrated with other aspects of the development such as open space or green infrastructure, so as to ensure an efficient use of the site vii. Describe the multifunctional benefits the sustainable drainage system will provide viii. Set out which opportunities to reduce the causes and impacts of flooding have been identified and included as part of the proposed sustainable drainage system ix. Explain how run-off from the completed development will be prevented from causing an impact elsewhere x. Explain how the sustainable drainage system been designed to facilitate maintenance and, where relevant, adoption. Set out plans for ensuring an acceptable standard of operation and maintenance throughout the lifetime of the development • detail those measures that will be included to ensure the development will be safe and remain operational during a flooding event throughout the development's lifetime without increasing flood risk elsewhere; • identify and secure opportunities to reduce the causes and impacts of flooding overall during the period of construction; and	

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	• be supported by appropriate data and information, including historical information on previous events.	
5.8.17	Development (including construction works) will need to account for any existing watercourses and flood and coastal erosion risk management structures or features, or any land likely to be needed for future structures or features so as to ensure: • Access, clearances and sufficient land are retained to enable their maintenance, repair, operation, and replacement, as necessary • Their standard of protection is not reduced Their condition or structural integrity is not reduced	All of the proposed new substations and extensions to existing substations are located in Flood Zone 1. Six of the proposed CSE compounds are located in Flood Zone 1. The CSE compound site at Wenham Grove is partially situated in Flood Zone 3 following the release of updated flood mapping dataset from the Environment Agency. This CSE compound would be laid out in accordance with the sequential approach, whereby the most vulnerable components are located in areas at lowest risk of flooding. The requirements for compensation of loss of floodplain storage associated with the pylons is addressed in the following sub-section and secured by commitment W17 in the Outline CoCP (document reference 7.2). No discernible loss of floodplain storage is associated with the CSE compound, associated above ground infrastructure has a very limited footprint. ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) concludes that the River Stour is the only main river that would be crossed by the underground cables. A trenchless crossing technique is proposed for the crossing of the River Stour. ES Chapter 12 also notes that the choice of watercourse crossing technique is dependent on several factors, for example, watercourse size, flood risk sensitivity, ecological sensitivity and location. Where underground cables cross watercourses, it is assumed that ordinary watercourses would be open cut crossings. The crossing methods have been discussed with the Flood Risk Management Authorities who have raised no comments, full response provided in Appendix A of the FRA (document reference 7.9). Details of specific watercourse crossings are identified within ES Appendix 4.2: Watercourse Crossing Details (document reference 6.4.A2). The crossing of the River

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		Stour and other ordinary watercourses along the route would be undertaken in accordance with the standard practice measures documented in the Outline CoCP (document reference 7.2). Discussions would also be held with the Environment Agency in relation to any required consents and permits necessary of the works, in accordance with commitment W01 in the Outline CoCP (document reference 7.2). The works would subsequently be carried out in accordance with the requirements of these consents, thereby safeguarding water environment receptors.
5.8.18 – 5.8.19	Applicants for Projects which may be affected by, or may add to, flood risk should arrange pre-application discussions before the official pre-application stage of the NSIP process with the EA or NRW, and, where relevant, other bodies such as Lead Local Flood Authorities, Internal Drainage Boards, sewerage undertakers, navigation authorities, highways authorities and reservoir owners and operators. Such discussions should identify the likelihood and possible extent and nature of the flood risk, help scope the FRA, and identify the information that will be required by the Secretary of State to reach a decision on the application when it is submitted. The Secretary of State should advise applicants to undertake these steps where they appear necessary but have not yet been addressed.	The FRA (document reference 7.9) has been informed by consultation and engagement with the relevant flood risk management authorities (the Environment Agency and Lead Local Flood Authorities (LLFAs) (Norfolk County Council, Suffolk County Council, Essex County Council and Thurrock Council)) and the Water Management Alliance Internal Drainage Boards (IDBs), as well as Anglian Water. National Grid also circulated a draft version of the FRA to the Environment Agency, IDB and LLFA ahead of the submission of the application for development consent for their consideration and comment. Subsequently, the consultees' feedback was taken into consideration whilst preparing the submission version of the FRA. Draft Statements of Common Ground have been prepared with the Environment Agency, LLFA, local authorities, Anglian Water and Northumbrian Water (Essex and Suffolk Water) (document reference 5.9.27).
5.8.20	If the EA, NRW or another flood risk management authority has reasonable concerns about the proposal on flood risk grounds, the applicant should discuss these concerns with the EA or NRW and take all	National Grid has held a number of meetings with relevant organisations, including the Environment Agency and the LLFAs (Norfolk County Council, Suffolk County Council, Essex County Council and Thurrock Council)) and the Water

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	reasonable steps to agree ways in which the proposal might be amended, or additional information provided, which would satisfy the authority's concerns.	Management Alliance Internal Drainage Boards (IDBs), as well as Anglian Water. Discussions have informed the development of the FRA (document reference 7.9).
5.8.21 to 5.8.23	The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites with medium risk areas and then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas The technology specific NPSs set out some exceptions to the application of the Sequential Test. However, when seeking development consent on a site allocated in a development plan through the application of the Sequential Test, informed by a strategic flood risk assessment, applicants need not apply the Sequential Test, provided the proposed development is consistent with the use for which the site was allocated and there is no new flood risk information that would have affected the outcome of the test. Consideration of alternative sites should take account of the policy on alternatives set out in Section 4.3 above. All projects should apply the Sequential Test to locating development within the site.	A sequential approach has been taken in siting the Project. The majority of the Project lies within Flood Zone 1 and in zones that are at low risk of flooding from other sources. Due to the linear nature of the Project some sections must necessarily be located in areas with a medium or high likelihood of flooding (Flood Zones 2 and 3). Detail on the Sequential and Exception Test are provided in Sections 5.1 and 5.2 of the FRA (document reference 7.9) submitted as part of the application for development consent and the Planning Statement Section 7. The Project is classified as 'essential infrastructure' with respect to flooding vulnerability in the NPPF. With regard to the ethos of the Sequential Test, which encourages the location of new development in areas at low risk of flooding, the analysis within the preceding sections has demonstrated that the majority of the Project lies within Flood Zone 1 and in zones that are at low risk of flooding from other sources. This has been achieved through an iterative process of design informed by detailed routeing and siting studies and stakeholder feedback. However, given the linear nature of the Project and its large geographical scale, avoidance of all areas of fluvial floodplain and areas at risk of surface water flooding is not practicable and therefore cannot be located in an alternative location of lower flood risk. Works in these areas however are largely temporary, associated with construction of the Project, and during its operation (and maintenance) are limited to a small number of pylons in the fluvial floodplain (that are of low vulnerability to inundation) and areas at risk of surface water flooding on some localised reaches of permanent routes of access.

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		The substations and CSE compounds represent the parts of the Project that are most vulnerable to flooding. All of the proposed new substations and extensions to existing substations are located in Flood Zone 1. Six of the proposed CSE compounds are located in Flood Zone 1. The CSE compound site at Wenham Grove is partially situated in Flood Zone 3 following the release of updated flood mapping dataset from the Environment Agency. This CSE compound would be laid out in accordance with the sequential approach, whereby the most vulnerable components are located in areas at lowest risk of flooding. The requirements for compensation of loss of floodplain storage associated with the pylons is addressed in the following sub-section and secured by commitment W17 in the Outline CoCP (document reference 7.2). No discernible loss of floodplain storage is associated with the CSE compound, associated above ground infrastructure has a very limited footprint.
	Mitigation	
5.8.24	To satisfactorily manage flood risk, arrangements are required to manage surface water and the impact of the natural water cycle on people and property	Drainage would be managed in accordance with the measures in the Outline CoCP (document reference 7.2). In accordance with good practice measures W08, W13, W14 and AS05 in the Outline CoCP (document reference 7.2), the drainage infrastructure associated with new areas of permanent impermeable land would not alter groundwater recharge patterns and land would be reinstated following construction. A specialised drainage contractor would review the designs and would provide advice to National Grid and its contractor during relevant construction and reinstatement activities. There is therefore no need for planning obligation.
5.8.25	In this NPS, the term SuDS refers to the whole range of sustainable approaches to surface water drainage management including, where appropriate: • source control measures including rainwater recycling and drainage • infiltration devices to allow water to soak into the ground, that can include individual soakaways and communal facilities	

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	• filter strips and swales, which are vegetated features that hold and drain water downhill mimicking natural drainage patterns • filter drains and porous pavements to allow rainwater and run-off to infiltrate into permeable material below ground and provide storage if needed • basins, ponds and tanks to hold excess water after rain and allow controlled discharge that avoids flooding • flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding	
5.8.26	Site layout and surface water drainage systems should cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts.	
5.8.27	The surface water drainage arrangements for any project should, accounting for the predicted impacts of climate change throughout the development's lifetime, be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, unless specific off-site arrangements are made and result in the same net effect.	
5.8.28	It may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site. There may be circumstances where it is appropriate for infiltration facilities or attenuation storage to be provided outside the project site, if necessary, through the use of a planning obligation.	

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5.8.29	The sequential approach should be applied to the layout and design of the project. Vulnerable aspects of the development should be located on parts of the site at lower risk and residual risk of flooding. Applicants should seek opportunities to use open space for multiple purposes such as amenity, wildlife habitat and flood storage uses. Opportunities should be taken to lower flood risk by reducing the built footprint of previously developed sites and using SuDS.	A sequential approach has been taken in siting the Project. Due to the linear nature of the Project some sections must necessarily be located in areas with a medium or high likelihood of flooding (Flood Zones 2 and 3). Detail on the Sequential and Exception Test are provided in Sections 5.1 and 5.2 of the FRA (document reference 7.9) submitted as part of the application for development consent. With regard to the ethos of the Sequential Test, which encourages the location of new development in areas at low risk of flooding, the analysis within the preceding sections has demonstrated that the majority of the Project lies within Flood Zone 1 and in zones that are at low risk of flooding from other sources. This has been achieved through an iterative process of design informed by detailed routeing and siting studies and stakeholder feedback. However, given the linear nature of the Project and its large geographical scale, avoidance of all areas of fluvial floodplain and areas at risk of surface water flooding is not practicable and therefore cannot be located in an alternative location of lower flood risk. Works in these areas however are largely temporary, associated with construction of the Project, and during its operation (and maintenance) are limited to a small number of pylons in the fluvial floodplain (that are of low vulnerability to inundation) and areas at risk of surface water flooding on some localised reaches of permanent routes of access. The substations and CSE compounds represent the parts of the Project that are most vulnerable to flooding. All of the proposed new substations and extensions to existing substations are located in Flood Zone 1. Six of the proposed CSE compounds are located in Flood Zone 1. The CSE compound site at Wenham Grove is partially situated in Flood Zone 3 following the release of updated flood mapping dataset from the Environment Agency. This CSE compound would be

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		laid out in accordance with the sequential approach, whereby the most vulnerable components are located in areas at lowest risk of flooding. The requirements for compensation of loss of floodplain storage associated with the pylons is addressed in the following sub-section and secured by commitment W17 in the Outline CoCP (document reference 7.2). No discernible loss of floodplain storage is associated with the CSE compound, associated above ground infrastructure has a very limited footprint. The permanent Project works which lie within Flood Zone 3 are restricted the Wenham Grove CSE Compound described above and to a small number of pylons for the overhead lines. These are designed such that they are resilient to flooding, ensuring the Project would be safe and could continue to operate. The Exception Test is therefore concluded to be satisfied, as the Project brings significant benefits to the region via its delivery of safe, reliable, and renewable electricity, the Project would not result in an increase in flood risk elsewhere and has been designed to be resilient to flooding throughout its lifetime.
5.8.30	Where a development may result in an increase in flood risk elsewhere through the loss of flood storage, on-site level-for-level compensatory storage, accounting for the predicted impacts of climate change over the lifetime of the development, should be provided.	Flood risk to and arising from the Project during construction has been assessed and the following points have been concluded: The majority of the Project is at low risk of fluvial flooding. Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures which include managing these worksites in accordance with a Flood Warning and Evacuation Plan. These measures would protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk. As there would be no works within the inter-tidal zone and only limited works in the tidally dominated floodplain (associated

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		with the removal of an existing overhead line), the Project is not anticipated to increase tidal/coastal flood risk during construction. Appropriate measures for managing the residual risk associated with the overhead line removal works in the tidally dominated floodplain of the River Stour have been incorporated into the Outline Flood Warning and Evacuation Plan (Appendix G of the Outline CoCP (document reference 7.2)). With respect to surface water flooding, during construction and operation, the Project is considered to be largely at low risk, with some areas at higher risk. Measures would be in place to manage surface water runoff and minimise impacts on the land drainage regime across the Project, including allowances for climate change resilience within the designs of operational SuDS. During construction the Project will be at low risk of flooding from groundwater and is not anticipated to increase flood risk from this source.
5.8.33 – 5.8.34	The receipt of and response to warnings of floods is an essential element in the management of the residual risk of flooding. Flood Warning and evacuation plans should be in place for those areas at an identified risk of flooding. The applicant should take advice from the local authority emergency planning team, emergency services and, where appropriate, from the local resilience forum when producing an evacuation plan for a manned energy project as part of the FRA. Any emergency planning documents, flood warning and evacuation procedures that are required should be identified in the FRA.	An Outline Flood Warning and Evacuation Plan (FWEP) has been prepared as part of the Outline CoCP (Appendix G, document reference 7.2). The key aim of an Outline FWEP is to provide the construction site manager(s) and on-site personnel with clear information on triggers and actions to take should a flood event occur during the construction of the Project, including confirming when a work site should be evacuated. An Outline FWEP also provides key information for planning an evacuation.

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	Secretary of State decision making	
5.8.36	In determining an application for development consent, the Secretary of State should be satisfied that where relevant: • the application is supported by an appropriate FRA • the Sequential Test has been applied and satisfied as part of site selection • a sequential approach has been applied at the site level to minimise risk by directing the most vulnerable uses to areas of lowest flood risk • the proposal is in line with any relevant national and local flood risk management strategy • SuDS (as required in the next paragraph on National Standards) have been used unless there is clear evidence that their use would be inappropriate. • in flood risk areas the project is designed and constructed to remain safe and operational during its lifetime, without increasing flood risk elsewhere (subject to the exceptions set out in paragraph 5.8.42) • the project includes safe access and escape routes where required, as part of an agreed emergency plan, and that any residual risk can be safely managed over the lifetime of the development • land that is likely to be needed for present or future flood risk management infrastructure has been appropriately safeguarded from development to the extent that development would not prevent or hinder its construction, operation or maintenance	The FRA (document reference 7.9) has been undertaken in line with relevant guidance and planning policy requirements as summarised in the document. A sequential approach has been taken in siting the Project. Due to the linear nature of the Project some sections must necessarily be located in areas with a medium or high likelihood of flooding (Flood Zones 2 and 3). The Exception Test is therefore engaged. Detail on the Sequential and Exception Test are provided in Sections 5.1 and 5.2 of the FRA (document reference 7.9) submitted as part of the application for development consent and Section 7 of the Planning Statement. The substations and CSE compounds represent the parts of the Project that are most vulnerable to flooding. All of the proposed new substations and extensions to existing substations are located in Flood Zone 1. Six of the proposed CSE compounds are located in Flood Zone 1. The CSE compound site at Wenham Grove is partially situated in Flood Zone 3 following the release of updated flood mapping dataset from the Environment Agency. This CSE compound would be laid out in accordance with the sequential approach, whereby the most vulnerable components are located in areas at lowest risk of flooding. The requirements for compensation of loss of floodplain storage associated with the pylons is addressed in the following sub-section and secured by commitment W17 in the Outline CoCP (document reference 7.2). No discernible loss of floodplain storage is associated with the CSE compound, associated above ground infrastructure has a very limited footprint. The permanent Project works which lie within Flood Zone 3 are restricted the Wenham Grove CSE Compound described above and to a small number of the pylons for the overhead

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		line. The requirements for compensation of loss of floodplain storage associated with these pylons is addressed in the following sub-section and secured by commitment W17 in the Outline CoCP (document reference 7.2). The Sequential and Exception Test has been undertaken. To satisfy planning requirements, an Exception Test is required to prove: • The development provides wider sustainability benefits to the community, that outweigh flood risk • The development will be safe for its lifetime, taking account of the vulnerability of its users, without increasing flood risk overall In response to the first part of the Exception Test the need for the Project is explained in the Strategic Options Backcheck and Review (document reference 7.17) and summarised in the Planning Statement (document reference 5.6) The Project is nationally significant low carbon infrastructure which is of CNP and one of the essential network reinforcements needed to urgently deliver the UK's net zero target. The reinforcement will also support security and reliability of electricity supply. Without reinforcement, the capacity of the existing electricity network in East Anglia and the South East is insufficient to accommodate the connection of proposed new power sources connecting in the area. The Project would provide this reinforcement, helping to deliver 50 GW of electricity from offshore wind by 2030, and ultimately contributing towards achieving net zero. With regard to the second test. the permanent Project works which lie within Flood Zone 3 are restricted to a small number of pylons for the overhead lines and a partial area of the Wenham Grove CSE Compound. These elements would be designed such that they are resilient to flooding, ensuring the Project would be safe and could continue to operate. A suite of measures would be adopted to prevent flood risk increases

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		during construction and operation of the Project. Temporary worksites in floodplains would operate in accordance with the protocols detailed in a Flood Warning and Evacuation Plan (Appendix G of the Outline CoCP (document reference 7.2)), to safeguard construction personnel and prevent flood damages to construction equipment and materials. The Project would not result in an increase in flood risk elsewhere and has been designed to be resilient to flooding throughout its lifetime. An Outline Flood Warning and Evacuation Plan (FWEP) has been prepared as part of the Outline CoCP (Appendix G, document reference 7.2). The key aim of an Outline FWEP is to provide the construction site manager(s) and on-site personnel with clear information on triggers and actions to take should a flood event occur during the construction of the Project, including confirming when a work site should be evacuated. An Outline FWEP also provides key information for planning an evacuation.
5.8.37	For energy projects which have drainage implications, approval for the project's drainage system, including during the construction period, will form part of the development consent issued by the Secretary of State. The Secretary of State will therefore need to be satisfied that the proposed drainage system complies with any National Standards published by Ministers under paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010.	The construction phase drainage would be managed in accordance with the commitments GG38 and AS05 of the Outline CoCP (document reference 7.2). As set out in commitment W08, surface water runoff from operational above ground infrastructure will be managed in accordance with the requirements and standards of the relevant Lead Local Flood Authority (LLFA) and adopt suitable sustainable drainage techniques that will be maintained for the Projects lifetime, designed to allow for climate change resilience.
5.8.38	In addition, the Development Consent Order, or any associated planning obligations, will need to make provision for appropriate operation and maintenance of any SuDS throughout the project's lifetime. Where this is secured through the adoption of any SuDS features,	As documented in the FRA (document reference 7.9) and Outline CoCP (document reference 7.2) Measures to manage surface water runoff from operational above ground infrastructure and to maintain existing overland flow routes, for example the proposed box culverts at Tilbury North Substation and the eastern of the two CSE compounds, will be developed

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	any necessary access rights to property will need to be granted.	liaising with the Lead Local Flood Authority (LLFAs). Such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime. Surface water runoff will be captured using sustainable drainage techniques that will be designed to allow for climate change resilience and with consideration of exceedance flow routes.
5.8.39	Where relevant, the Secretary of State should be satisfied that the most appropriate body is being given the responsibility for maintaining any SuDS, taking into account the nature and security of the infrastructure on the proposed site. Responsible bodies could include, for example the landowner, the relevant lead local flood authority or water and sewerage company (through the Ofwat approved Sewerage Sector Guidance), or another body, such as an Internal Drainage Board.	Where permanent drainage is installed, it will be inspected and maintained by the Applicant, as required, so that it can continue to operate the Project to the design standard, safeguarding surface and groundwater quality.
5.8.41	Energy Projects should not normally be consented within Flood Zone 3b, or Zone C2 in Wales, or on land expected to fall within these zones within its predicted lifetime. This may also apply where land is subject to other sources of flooding (for example surface water). However, where essential energy infrastructure has to be located in such areas, for operational reasons, they should only be consented if the development will not result in a net loss of floodplain storage, and will not impede water flows.	See response to 5.8.36
5.8.42	Exceptionally, where an increase in flood risk elsewhere cannot be avoided or wholly mitigated, the Secretary of State may grant consent if they are satisfied that the increase in present and future flood risk can be mitigated to an acceptable and safe level and taking account of the benefits of, including the need for, nationally significant energy infrastructure as set out in	See response to 5.8.30

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	Part 3 above. In any such case the Secretary of State should make clear how, in reaching their decision, they have weighed up the increased flood risk against the benefits of the project, taking account of the nature and degree of the risk, the future impacts on climate change, and advice provided by the EA or NRW and other relevant bodies.	
5.9	**Historic Environment**	
5.9.8	Impacts on heritage assets specific to types of infrastructure are included in the technology specific NPSs.	Noted.
	Applicant assessment	
5.9.9	The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES (see Section 4.3). This should include consideration of heritage assets above, at, and below the surface of the ground. Consideration will also need to be given to the possible impacts, including cumulative, on the wider historic environment. The assessment should include reference to any historic landscape or seascape character assessment and associated studies as a means of assessing impacts relevant to the proposed project.	ES Chapter 11: Historic Environment (document reference 6.11) presents the assessment of the Project on heritage assets. The ES Chapter is supported by the following appendices: • Appendix 11.1 Historic Environment Baseline Report (document reference 6.11.A1) • Appendix 11.2 Historic Environment Assessment Tables (document reference 6.11.A2) • Appendix 11.3 EACN Substation Geophysical Survey Report (document reference 6.11.A3) • Appendix 11.4 Geophysical Survey Results Report (document reference 6.11.A4) • Appendix 11.5 Trial Trenching Results Report (document reference 6.11.A5) • Appendix 11.6 Geoarchaeological and Archaeological Monitoring of Ground Investigation Works Report (document reference 6.11.A6)

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		• Appendix 11.7 Assessment of Harm to Designated Heritage Assets (document reference 6.11.A7) National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse residual effects on cultural heritage and archaeological assets. Mitigation measures to reduce impacts on archaeology are set out in the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMS-OWSI) (document reference 7.5) which includes preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction.
5.9.10 – 5.9.11	As part of the ES the applicant should provide a description of the significance of the heritage assets affected by the proposed development, including any contribution made by their setting. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum, the applicant should have consulted the relevant Historic Environment Record (or, where the development is in English or Welsh waters, Historic England or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development's impact. Where a site on which development is proposed includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out	The heritage assets are described in ES Appendix 11.1: Historic Environment Baseline Report (document reference 6.11.A1), which in turn is supported by a gazetteer of heritage assets from archaeological remains, historic landscape features and historic buildings, both designated and non-designated. All publicly available historic environment data has been acquired from open data sources and the county HER for Norfolk, Suffolk, Essex and Thurrock. ES Appendix 11.2: Historic Environment Assessment Tables (document reference 6.11.A2) presents a proportionate assessment of the impacts of the Project on the heritage assets, including their setting. Section 11.4 of ES Chapter 11: Historic Environment (document reference 6.11) describes the methodology and data sources used to establish the baseline environment and the approach to consider and assess the significance of potential effects on the historic environment.

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	appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, accurate representative visualisations may be necessary to explain the impact.	
5.9.12	The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents. Studies will be required on those heritage assets affected by noise, vibration, light and indirect impacts, the extent and detail of these studies will be proportionate to the significance of the heritage asset affected.	Noted. ES Chapter 11: Historic Environment (document reference 6.11) presents the assessment of the Project on heritage assets. ES Appendix 11.2 Historic Environment Assessment Table to ES Chapter 11: Historic Environment (document reference 6.11.2) lists the heritage assets which could be impacted by the Project including potential impacts from noise, vibration, light and indirect impacts. and should be read in conjunction with the following reports and figures • ES Figure 11.1: Historic Environment Study Area (document reference 6.11.F1) • ES Figure 11.2: Designated Heritage Assets Assessed in the ES Chapter (document reference 6.11.F2) • ES Figure 11.3: Non-Designated Heritage Assets Assessed in the ES Chapter (document reference 6.11.F3) • ES Figure 11.4: Geophysical Survey and Archaeological Trial Trenching Priority Areas (document reference 6.11.F4) • ES Figure 11.5: Historic Environment and LVIA Viewpoint Locations (document reference 6.11.F5) • ES Appendix 11.1: Historic Environment Baseline Report (document reference 6.11.A1) • ES Appendix 11.2: Historic Environment Assessment Tables (document reference 6.11.A2) • ES Appendix 11.3: EACN Substation Geophysical Survey Report (document reference 6.11.A3)

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		• ES Appendix 11.4: Geophysical Survey Results Report (document reference 6.11.A4) • ES Appendix 11.5: Trial Trenching Results Report (document reference 6.11.A5) • ES Appendix 11.6: Geoarchaeological and Archaeological Monitoring of Ground Investigation Works Report (document reference 6.11.A6) • ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets (document reference 6.11.A7)
5.9.14	Careful consideration in preparing the scheme will be required on whether the impacts on the historic environment will be direct or indirect, temporary, or permanent.	Direct, indirect, temporary and permanent effects to heritage assets are presented in ES Chapter 11: Historic Environment (document reference 6.11).
5.9.15	Applicants should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.	The Project does not propose any new development in Conservation Areas or World Heritage Sites. Appendix 11.1: Historic Environment Baseline Report (document reference 6.11.A1) provides a detailed overview of the heritage assets, including Conservation Areas which are within the defined Study Area.
	Mitigation	
5.9.16	A documentary record of our past is not as valuable as retaining the heritage asset, and therefore the ability to record evidence of the asset should not be a factor in deciding whether such loss should be permitted, and whether or not consent should be given.	The Outline AMS-OWSI (document reference 7.5) stipulate the need for preservation by record wherever practicable, particularly for high value assets. Further mitigation, including the recording of evidence of the asset, is only considered where preservation in situ is not proportionate to the value of the asset.
5.9.17	Where the loss of the whole or part of a heritage asset's significance is justified, the Secretary of State will require the applicant to record and advance understanding of the significance of the heritage asset	The Outline AMS-OWSI (document reference 7.5) stipulate the need for preservation by record i.e., archaeological hand excavation and recording, of archaeological remains not deemed significant enough to be preserved in place. The

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	before it is lost (wholly or in part). The extent of the requirement should be proportionate to the asset's importance and significance and the impact. The applicant should be required to publish this evidence and to deposit copies of the reports with the relevant Historic Environmental Record. They should also be required to deposit the archive generated in a local museum or other public repository willing to receive it.	Outline AMS-OWSI outlines the proposed process for publishing, depositing and archiving data.
5.9.18	Where appropriate, the Secretary of State will impose requirements on the Development Consent Order to ensure that the work is undertaken in a timely manner, in accordance with a written scheme of investigation that complies with the policy in this NPS and which has been agreed in writing with the relevant local authority, and to ensure that the completion of the exercise is properly secured.	The strategy for archaeological mitigation is defined along with further detail regarding specific sites within the Outline AMS-OWSI (document reference 7.5). This document has been informed by discussions with historic environment advisers from the respective LPA. The Outline AMS-OWSI is secured through Requirement 5 of Schedule 3 of the draft DCO (document reference 3.1) which states that the authorised development must be undertaken in accordance with the AMS-OWSI.
5.9.19 and 5.9.20	Where the loss of significance of any heritage asset has been justified by the applicant on the merits of the new development and the significance of the asset in question, the Secretary of State should consider: • imposing a requirement in the Development Consent Order • requiring the applicant to enter into an obligation That will prevent the loss occurring until the relevant part of the development has commenced, or it is reasonably certain that the relevant part of the development is to proceed.	National Grid has identified that none of the harm to designated assets is of so considerable a scale as to be classified as substantial harm. It is considered that the lower less than substantial harm and mid less than substantial harm reported in Appendix 11.7 (document reference 6.11.A7) does equate to a loss of significance to heritage assets.
5.9.21	Where there is a high probability (based on an adequate assessment) that a development site may include, as yet undiscovered heritage assets with archaeological interest, the Secretary of State will consider	The strategy for archaeological mitigation is defined along with further detail regarding specific sites within the Outline AMS-OWSI (document reference 7.5). The Outline AMS-OWSI is secured through Requirement 5 of Schedule 3 of the draft

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	requirements to ensure appropriate procedures are in place for the identification and treatment of such assets discovered during construction.	DCO (document reference 3.1), which states that the authorised development must be undertaken in accordance with the Outline AMS-OWSI.
	Secretary of State decision making	
5.9.22	In determining applications, the Secretary of State should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development, including by development affecting the setting of a heritage asset (including assets whose setting may be affected by the proposed development), taking account of: • relevant information provided with the application and, where applicable, relevant information submitted during the examination of the application • any designation records, including those on the National Heritage List for England, or included on Cof Cymru for Wales. • historic landscape character records • the relevant Historic Environment Record(s), and similar sources of information • representations made by interested parties during the examination process • expert advice, where appropriate, and when the need to understand the significance of the heritage asset demands it	Section 11.4 of ES Chapter 11: Historic Environment (document reference 6.11) describes the methodology and data sources used to establish the baseline and the approach to consider and assess the significance of potential effects on the historic environment. Heritage assets have been identified within the Study Area through desk-based assessment and through the site surveys. This information has been used to assign assets a value (sensitivity) as defined in ES Chapter 5: EIA Approach and Method (document reference 6.5). The effects on heritage assets caused by change within their setting is assessed in ES Chapter 11: Historic Environment (document reference 6.11). Further details in relation to the setting of heritage assets is presented in ES Appendix 11.1: Historic Environment Baseline Report (document reference 6.11.A1).
5.9.23	The Secretary of State must also comply with the requirements on listed buildings, conservation areas and scheduled monuments, set out in Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010.	Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010 (as amended) (HM Government, 2010) Regs – Having regard to the desirability of preserving listed buildings, conservation areas and scheduled monuments and their settings where a development would affect these matters. This is considered in Chapter 7 of the Planning Statement

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		(document reference 5.6), ES Chapter 11: Historic Environment (document reference 6.11) and ES Appendix 11.2 Historic Environment Assessment Tables (document reference 6.11.A2). ES Chapter 11: Historic Environment (document reference 6.11) presents the results of the assessment on listed buildings, conservation areas and scheduled monuments. No listed buildings or buildings that contribute to the character of a conservation area would be demolished as a result of the Project, therefore the assessment presented in ES Chapter 11: Historic Environment (document reference 6.11) focuses on the effects through change to setting. No physical impacts are predicted to scheduled monuments therefore the assessment focuses on the effects through change to setting.
5.9.27	When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance.	ES Chapter 11: Historic Environment (document reference 6.11) presents the assessment of the likely significant cultural heritage effects that could result from the Project. Through sensitive routeing and siting National Grid has sought to avoid and reduce, as far as possible, adverse effects on identified heritage assets. National Grid is proposing to utilise low height pylons for the section of overhead line that passes between Great Waltham conservation area/ Langleys registered park and garden and Little Waltham Conservation Area, to reduce visibility of the alignment from Langleys House and more distant elements of the conservation areas and park and garden. The Project has been designed to avoid and reduce impacts to heritage assets. This has been informed by the geophysical survey and the evaluation trenching, as well as other surveys such as the walkover survey. Both the NPS EN-1 and NPPF require an assessment of harm to heritage significance. EN-1 and the NPPF further categorise that harm into 'substantial' and 'less than substantial'. The

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		PPG which supports the NPPF heritage policies expects potential harm to designated heritage assets to be categorised as either less than substantial harm or substantial harm (which includes total loss) and that within each category of harm identified, the extent of the harm should be clearly articulated. ES Appendix 11.7 (document reference 6.11.A7) concludes that none of the harm is of so considerable a scale as to be classified as substantial harm. It is considered that the lower less than substantial harm and mid less than substantial harm reported in Appendix 11.7 (document reference 6.11.A7) does equate to a loss of significance to heritage assets. This loss of significance should be considered against the wider public benefit associated with the delivery of this Project (considered at Paragraph 5.9.32 and 5.9.33. The strategy for archaeological mitigation is defined along with further detail regarding specific sites within the Outline AMS-OWSI (document reference 7.5).
5.9.28 to 5.9.30	The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification. Substantial harm to or loss of significance of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional. Substantial harm to or loss of significance of assets of the highest significance, including Scheduled Monuments; Protected Wreck Sites; Registered Battlefields; grade I and II* Listed Buildings; grade I and	An assessment of impact to the heritage significance of assets is included in ES Chapter 11: Historic Environment (document reference 6.11) and ES Appendix 11.2: Historic Environment Assessment Tables (document reference 6.11.A2). ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological

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	II* Registered Parks and Gardens; and World Heritage Sites, should be wholly exceptional.	assets. ES Chapter 11 concludes that the Project would not result in substantial harm to any heritage assets.
5.9.31	Where the proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to, or loss of, significance is necessary to achieve substantial public benefits that outweigh that harm or loss, or all the following apply: • the nature of the heritage asset prevents all reasonable uses of the site • no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation • conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible • the harm or loss is outweighed by the benefit of bringing the site back into use	An assessment of impact to the heritage significance of assets is included in ES Chapter 11: Historic Environment (document reference 6.11) and ES Appendix 11.2: Historic Environment Assessment Tables (document reference 6.11.A2). ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. ES Chapter 11 concludes that the Project would not result in substantial harm to any heritage assets. It is considered that the lower less than substantial harm and mid less than substantial harm reported in Appendix 11.7 (document reference 6.11.A7) does equate to a loss of significance to heritage assets. The substantial public benefits and need for the Project, as set out in Chapter 3 of this Planning Statement, contributes towards meeting national energy security objectives, clearly and demonstrably outweigh the less than substantial harm, at the medium and lower end of the spectrum, to the designated heritage assets. The potential for harm or loss of significance upon non- designated heritage assets affected by the Project is also clearly outweighed by the substantial public benefits and need for the Project

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5.9.32	Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use.	ES Chapter 11: Historic Environment (document reference 6.11) concludes that the Project would not result in substantial harm to any designated historic assets but will result in less than substantial harm and mid less than substantial harm reported in Appendix 11.7 (document reference 6.11.A7) does equate to a loss of significance to heritage assets. The substantial public benefits and need for the Project, as set out in the Planning Statement (document reference 5.6), including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives, clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage asset of schedulable quality.
5.9.33	In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.	The substantial public benefits and need for the Project, as set out in Chapter 3 of this Planning Statement, contributes towards meeting national energy security objectives, clearly and demonstrably outweigh the less than substantial harm, at the medium and lower end of the spectrum, to the designated heritage assets. The potential for harm or loss of significance upon non- designated heritage assets affected by the Project is also clearly outweighed by the substantial public benefits and need for the Project providing the judgement required under paragraph 5.9.33 of NPS EN-1.
5.9.36	When considering applications for development affecting the setting of a designated heritage asset, the Secretary of State should give appropriate weight to the desirability of preserving the setting such assets and treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the Secretary of State should give great weight to any negative effects, when weighing them against the wider	See response to 5.9.32. Overall, the need for the Project is set out in the Strategic Options Backcheck and Review (document reference 7.17) to which significant weight should be afforded. 'Need' is also clearly established by the NPS, which considers the need for new electricity transmission and distribution infrastructure as urgent as it supports the transition of the economy to net zero. The Project is also now considered Critical National Priority Infrastructure as per this NPS.

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	benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval.	
5.10	**Landscape and Visual**	
	Applicant assessment	
5.10.16 – 5.10.17	The applicant should carry out a landscape and visual impact assessment and report it in the ES, including cumulative effects (see Section 4.3). Several guides have been produced to assist in addressing landscape issues. The landscape and visual assessment should include reference to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project. The applicant's assessment should also take account of any relevant policies based on these assessments in local development documents in England and local development plans in Wales.	ES Chapter 13: Landscape and Visual (document reference 6.13) presents the landscape and visual assessment. Reference to landscape character assessments have been made in ES Chapter 13: Landscape and Visual (document reference 6.13) accompanied by: • ES Appendix 13.1: Landscape and Visual Methodology (document reference 6.13.A1) • ES Appendix 13.2: Landscape Baseline and Assessment (document reference 6.13.A2) • ES Appendix 13.3: Visual Baseline and Assessment (document reference 6.13.A3) • ES Appendix 13.4: Residential Visual Amenity Assessment (document reference 6.13.A4) • ES Appendix 13.5: National Landscape Assessment Study (document reference 6.13.A5) • ES Appendix 13.6: Arboricultural Impact Assessment (AIA) (document reference 6.13.A6) Published landscape character documents have been used as a means of assessing landscape effects, as described in ES Appendix 13.2: Landscape Baseline and Assessment (document reference 6.13.A2) Relevant local development plan documents that were taken into account in the assessment are set out in Section 13.2: Regulatory and

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		Planning Policy Context of ES Chapter 13 (document reference 6.13).
5.10.19	The applicant should consider landscape and visual matters in the early stages of siting and design, where site choices and design principles are being established. This will allow the applicant to demonstrate in the ES how negative effects have been minimised and opportunities for creating positive benefits or enhancement have been recognised incorporated into the design, delivery and operation of the scheme.	Embedded measures have been integral in reducing, and where possible, avoiding, the landscape and visual effects of the Project. Landscape and visual matters were considered in the early stages of siting and design. ES Chapter 3: Alternatives (document reference 6.3) which documents the key environmental factors that were considered in the optioneering and design evolution process, alongside the Design Development Report (document reference 5.15), Design and Access Statement (document reference 7.15), Design Approach for Site Specific infrastructure (document reference 7.16) and ES Chapter 3: Alternatives (document reference 6.3) summarises the different choices made during the design process. Chapter 5 of the Planning Statement (document reference 5.6) sets out how planning policy, namely EN-1 and EN-5, as well as the requirements of the Electricity Act and the principles of the Holford and Horlock Rules have influenced the options appraisal process; demonstrating how such policy objectives have been embedded into the design of the Project.
5.10.20	The assessment should include the effects on landscape components and character during construction and operation. For projects which may affect a National Park, The Broads or an Areas of Outstanding Natural Beauty the assessment should include effects on the natural beauty and special qualities of these areas'.	ES Chapter 13: Landscape and Visual (document reference 6.13) presents the landscape and visual assessment for the Project. In addition, ES Appendix 13.5: National Landscape Assessment Study (document reference 6.13.A5) is more specific and provides an assessment on National Landscapes. In accordance with national policy requirements, the Project has been designed following the mitigation hierarchy and has avoided impacts where possible through the routeing and siting process. This includes the decision to underground through Dedham Vale National Landscape and adjacent landscapes. A CSE compound would be located to the east of Raydon Great Wood, approximately 2 km to the north-east of the National

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		Landscape at its closest point. The Project would then transition back to overhead line, heading north away from the National Landscape. To the south-east of Dedham Vale National Landscape, the underground cable route would continue outside the National Landscape and terminate at a new substation known as the EACN Substation, approximately 1.3 km south of the National Landscape. ES Appendix 13.5: National Landscape Assessment Study (document reference 6.13.A5) considers the natural beauty, character and special qualities of Dedham Vale National Landscape. The National Landscape Assessment Study also sets out an assessment of the impacts of the Project on the special qualities of the National Landscape and how this may impact on the National Landscape's ability to deliver its statutory purpose to conserve and enhance natural beauty. The assessment concludes that there would be significant adverse effects during construction. The assessment of effects during operation (and maintenance) concludes that minor and not significant (adverse) effects would be experienced once the underground cable has been installed and the underground corridor reinstated.
5.10.21	The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include light pollution effects, including on dark skies, local amenity, and nature conservation.	ES Chapter 13: Landscape and Visual (document reference 6.13) and ES Appendix 13.3: Visual Baseline and Assessment (document reference 6.13.A3) present the assessment of effects on views and visual amenity during construction and operation of the Project. This includes consideration of the effects of lighting, where applicable.
5.10.22	The assessment should also address the landscape and visual effects of noise and light pollution, and other emissions (see Section 5.2 and Section 5.7), from construction and operational activities on residential amenity and on sensitive locations, receptors and views, how these will be minimised.	The route corridor would largely occupy a rural area. The largest settlements are Ipswich, Colchester, Chelmsford, Billericay, and Basildon. Smaller settlements including Diss, Stowmarket, Coggeshall, and a number of villages are distributed throughout the route corridor area.

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		In considering alternative strategic options, potential effects on urban areas and residential and recreational receptors were considered. From a socio-economic perspective, the strategic option taken forward would not affect any major areas of economic activity or tourism assets of national importance. The effects of lighting on landscape and visual receptors is considered where applicable, as set out in ES Appendix 13.2: Landscape Baseline and Assessment (document reference 6.13.A2) and ES Appendix 13.3: Visual Baseline and Assessment (document reference 6.13.A3). Effects on residential visual amenity are set out in ES Appendix 13.4: Residential Visual Amenity Assessment (document reference 6.13.A4).
5.10.24	Applicants should consider how landscapes can be enhanced using landscape management plans, as this will help to enhance environmental assets where they contribute to landscape and townscape quality.	In addition, National Grid is proposing a number of Environmental Areas along the Project, as described in the Biodiversity Net Gain Report (document reference 7.1), and the LEMP (document reference 7.4) which will contribute to enhancement of the landscape.
5.10.25	In considering visual effects it may be helpful for applicants to draw attention, in the supporting evidence to their applications, to any examples of existing permitted infrastructure they are aware of with a similar magnitude of impact on equally sensitive receptors. This may assist the Secretary of State in judging the weight they should give to the assessed visual impacts of the proposed development.	The landscape and visual assessment is presented in ES Chapter 13: Landscape and Visual (document reference 6.13). The landscape baseline includes the existing 400 kV overhead line, the existing 132 kV overhead line, Norwich Main Substation and Bramford Substation. Embedded measures relevant to the landscape and visual assessment included choosing a corridor that allowed for paralleling with Bramford to Twinstead 400kV overhead line at west of Ipswich, and the existing 132 kV overhead line at north of Flowton and north of Mellis, where the existing 132 kV overhead lines would be undergrounded, to limit the magnitude of change from the Project. As such, the existing 132 kV overhead line is considered as forming part of the baseline and provides an example of existing permitted infrastructure with a similar magnitude of impact.

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	Mitigation	
5.10.27	Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within its development site and wider setting. The careful consideration of colours and materials will support the delivery of a well-designed scheme, as will sympathetic landscaping and management of its immediate surroundings.	National Grid have sought to minimise adverse visual effects through the good design initiatives set out in response to 4.7.6 which sets out National Grid's approach to good design and demonstrates how National Grid has responded to the physical, environmental and socio-economic context of the overhead line route and CSE compound and substation locations. National Grid has sought to identify locations for the substations and CSE compounds which are able to take advantage of screening which is provided by existing tree belts and woodland areas. The land around National Grid permanent assets, where there is sufficient space, have been defined as Environmental Areas. These areas will provide landscape and visual screening benefits, as well as offering ecological value.
5.10.28	Depending on the topography of the surrounding terrain and areas of population it may be appropriate to undertake landscaping off site. For example, filling in gaps in existing tree and hedge lines may mitigate the impact when viewed from a more distant vista.	Planting proposals are set out in the Outline LEMP (document reference 7.4) which will be secured through Requirement 4 of Schedule 3 of the Draft DCO (document reference 3.1). Any loss of Habitat of Principal Importance would be lost on a temporary basis and would be reinstated in line with the habitat reinstatement principles set out in Chapter 9 of the Outline LEMP (document reference 7.4). Mitigation for the permanent loss of habitat would be delivered through the creation / enhancement of habitat associated with achieving BNG for the Project. Within the Order Limits six areas of land (defined as Environmental Areas) are proposed around the Project's permanent assets, where there is sufficient space. To ensure the target is reached, any additional creation / enhancement would be delivered outside of the Order Limits, as identified in the Biodiversity Net Gain Report (document reference 7.1).

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		National Grid has sought to identify locations for the substations and CSE compounds which are able to take advantage of screening which is provided by existing tree belts and woodland areas. The land around National Grid permanent assets, where there is sufficient space, have been defined as Environmental Areas. These areas will provide landscape and visual screening benefits, as well as offering ecological value. The following sites have currently been identified as Environmental Areas: • Land around Norwich Main Substation (areas not included in the Norwich Main Substation Planning application) • Land around Norwich Main Substation (areas not included in the Norwich Main Substation Extension Planning application) • Land around EACN Substation • Land around Tilbury North Substation and Tilbury North (Warley Side) and Tilbury North (Tilbury Side) CSE Compounds (with Lower Thames Crossing) • Land around Tilbury North Substation and Tilbury North (Warley Side) and Tilbury North (Tilbury Side) CSE Compounds (without Lower Thames Crossing) • Land around Wenham Grove CSE Compound • Land around Great Horkesley (EACN Side) CSE Compound • Land around Great Horkesley (Tilbury Side) CSE Compound • Land around Fairstead (EACN Side) and Fairstead (Tilbury Side) CSE Compounds. Details of the Environmental Areas are outlined in the Outline LEMP (document reference 7.4) and Appendix D: Outline Landscape Proposals of the Outline LEMP. This will be

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		secured through Requirement 4 of Schedule 3 of the Draft DCO (document reference 3.1).
	Secretary of State decision making	
5.10.29	The Secretary of State should take into consideration the level of detailed design which the applicant has provided and is secured in the Development Consent Order, and the extent to which design details are subject to future approvals.	The design of the infrastructure will be substantially dictated by the equipment they contain and the function that they need to provide. However, the designs will also be in accordance with the designs presented in the application for development consent and the embedded measures identified in the Outline CoCP (document reference 7.2) and Outline LEMP (document reference 7.4). The detailed designs will be undertaken by a competent contractor with knowledge of designing high voltage transmission lines and will be supported by environmental specialists including landscape architects and ecologists. National Grid considers that the extensive controls already in place in respect of the design of the Project negate the need for a further Requirement requiring the authorised development to be carried out in general accordance with the Design and Layout Plans and the embedded measures secured within the Management Plans.
5.10.30	The Secretary of State should be satisfied that local authorities will have sufficient design content secured to ensure future consenting will meet landscape, visual and good design objectives.	See response to 4.7.6 and5.10.29.
5.10.32	When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty the conservation and enhancement of the natural beauty should be given substantial weight by the Secretary of State in deciding on applications for development consent in these areas. The Secretary of State may grant development consent in these areas in exceptional circumstances. Such development should	Paragraphs 4.2.17 and 5.10.32 in NPS EN-1 confirm that the Secretary of State many grant development consent in nationally designated landscapes in exceptional circumstances. This includes demonstrating that the development will be in the public interest, along with other matters listed below. The Project meets the tests set out in Paragraph 5.10.32, as follows:

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	be demonstrated to be in the public interest and consideration of such applications should include an assessment of: • the need for the development, including in terms of national considerations, and the impact of consenting or not consenting it upon the local economy; • the cost of, and scope for, developing all or part of the development elsewhere outside the designated area or meeting the need for it in some other way, taking account of the policy on alternatives set out in Section 4.3; and • any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.	The need for the development as described in the Strategic Options Backcheck and Review (document reference 7.17) and Planning Statement (document reference 5.6) explains that The UK Government policy requires significant reinforcement of the transmission system to facilitate the connection of renewable energy sources to transport electricity to where it is used. The British Energy Security Strategy sets targets for the connection of up to 50GW of offshore wind by 2030s as a key part of a strategy for secure, clean and affordable British energy for the long term. Without reinforcement, the capacity of the East Anglia and South East existing network is insufficient to accommodate the connection of the proposed new power sources. Therefore, reinforcement of the network is required. The cost of, and scope for, developing elsewhere outside the designated area or meeting the need for it in some other way is set out in Strategic Options Backcheck and Review (document reference 7.17). ES Chapter 3: Alternatives (document reference 6.3) documents the decision taken at the Strategic Proposal stage to route through the Dedham Vale National Landscape with underground cables. This could be approximately half the length of a route that avoids the Dedham Vale National Landscape. In assessing route corridors through the National Landscape, National Grid preferred option was selected due to its greater distance from particularly highly valued parts of the Dedham Vale National Landscape, less potential for adverse effects on the historic environment and less potential for adverse effects on the historic environment and as it presents lower risk of Likely Significant Effects on the internationally designated sites (Stour and Orwell Estuaries SPA and supporting Cattawade

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		Marshes SSSI) and their qualifying features compared to other options through the National Landscape. Undergrounding and careful consideration of routeing and siting through the National Landscape has been adopted as an approach to reduce permanent significant effect on the environment, the landscape and recreational opportunities within the National Landscape. Although the Project would be underground within Dedham Vale National Landscape, construction would have direct impacts. The assessment of effects on special qualities within Dedham Vale National Landscape, as set out in Appendix 13.5: National Landscape Assessment Study (document reference 6.13.A5). The National Landscape Assessment Study concludes that effects on the special qualities of Dedham Vale National Landscape would reduce to minor and not significant (adverse) during operation once the underground cables are covered over and land use and landcover reinstated as far as possible. On the basis of the above, exceptional circumstances have been demonstrated to justify the proposed development in the Dedham Vale National Landscape in accordance with paragraphs 4.2.17 and 5.10.32 of NPS EN-1.
5.10.33	For development proposals located within designated landscapes the Secretary of State should be satisfied that measures which seek to further purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development. The Secretary of State should ensure that any projects consented in these designated areas should be carried out to high environmental standards, including through the application of appropriate requirements where necessary.	See response to 5.10.20 and 4.2.15-4.2.17 (inclusive).
5.10.34	The duty to seek to further the purposes of nationally designated landscapes also applies when considering	National Grid undertook a Setting Study, which is presented in ES Appendix 13.5: National Landscape Assessment Study,

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	applications for projects outside the boundaries of these areas which may have impacts within them. In these locations, projects should be sensitively given the various siting, operational, and other relevant constraints. The Secretary of State should be satisfied that measures which seek to further the purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development.	Annex A: Dedham Vale National Landscape Setting Study (document reference 6.13.A5). This defines the setting of the National Landscape in relation to the Project and has considered views in and out of the National Landscape as part of defining the setting. The Setting Study helped inform the design of the Project, including the extent of undergrounding. In respect to the Statutory Duty, Section 245 (Protected landscapes), of the Levelling-Up and Regeneration Act 2023 National Grid has produced National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) (document reference 5.10). In line with the Defra guidance (Defra, 2024) '*Appropriate, reasonable and proportionate steps*' are being considered and explored which would seek to further the statutory purposes of the National Landscape. An initial high level scoping exercise was undertaken to identify potential measures with specific consideration given to the special qualities of the Dedham Vale National Landscape and the Dedham Vale AONB and Stour Valley Project Area Management Plan 2021-2026. This scoping exercise included considering and identifying: • existing projects being delivered within the National Landscape which could be supported, • potential new projects which could be delivered in the National Landscape, and/or • financial contributions to a third party to deliver existing or new projects The potential measures and approach to the protected landscape duty being taken by National Grid has been discussed with stakeholders to seek their feedback. Engagement is being undertaken with the Dedham Vale National Landscape Partnership and relevant local authorities. This engagement is ongoing.

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		National Grid will continue to engage and work with stakeholders to seek agreement on the proposed package of measures to fulfil the duty to seek to further the statutory purpose of the Dedham Vale National Landscape. A working draft document setting out the proposed package of measures and the key principles of the fund has been shared with the DVNL Partnership for their feedback. The DVNL Partnership has stated that they are broadly content subject to some final specific areas to agree. Natural England and the relevant local authorities have also been provided the document for their information. A copy of the working draft has been provided in Appendix A of National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) (document reference 5.10). The package of measures is anticipated to be secured by a legal agreement. National Grid will work with the DVNL Partnership to agree the Heads of Terms for such a legal agreement, seeking to finalise the agreement prior to the close of the examination. A further update will be provided during the Examination as discussions with the stakeholders' progress
5.10.35	The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project.	ES Chapter 13: Landscape and Visual (document reference 6.13) presents the landscape and visual assessment including the effects of construction and operation of the Project on landscape receptors. The landscape and visual amenity assessments summarised in ES Chapter 13: Landscape and Visual (document reference 6.13) indicate that the construction phases would result in significant negative landscape and visual amenity effects. These significant effects are related to the introduction of construction activity and equipment, including the loss of some landscape features including farmland and field boundary vegetation. At Year 15 of operation, following the maturation of
5.10.36	In reaching a judgement, the Secretary of State should consider whether any adverse impact is temporary, such as during construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the Secretary of State considers reasonable.	

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		mitigation planting within Environmental Areas, the assessment concludes that significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure Projects, as set out in Paragraphs 5.10.5 and 5.10.13 of NPS EN-1.
5.10.37	The Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by appropriate mitigation.	The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. The Design Development Report (document reference 5.15) provides an explanation of the main changes in the route alignment and technology following the review and consideration of feedback received to the 2024 statutory consultation and to the targeted statutory and non-statutory consultations held in 2025. A Design and Access Statement (document reference 7.15) has also been produced sets out a summary of National Grid's approach to good design and demonstrates how National Grid has responded to the physical, environmental and socio-economic context of the overhead line route and CSE compound and substation locations and responded to consultation to define the Project. The Design Development Report and Design and Access Statement should be read alongside both ES Chapter 3: Alternatives (document reference 6.3), which documents the key environmental factors in consideration of the main alternatives, and the Planning Statement (document reference 5.6), which explains how planning policy, as well as the requirements of the Electricity Act and the principles of the Holford and Horlock Rules, have influenced the optioneering and design evolution process. The latter demonstrating how

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		such policy and legislative objectives have been embedded into the design of the Project. The landscape and visual effects of the Project are described in ES Chapter 13: Landscape and Visual (document reference 6.13) along with the proposed mitigation required to reduce any significant effects. Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features as far as reasonably practicable. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse residual landscape and visual effects. Embedded mitigation measures relevant to landscape and visual amenity include: Sensitive routeing and siting of the alignment and Order Limits - as far as practicable effects on identified environmental (including landscape and visual, ecology and heritage assets) and socio-economics receptors have been avoided and reduced. ES Chapter 3: Alternatives (document reference 6.3) summarises the Project routeing and site selection process and consideration of alternatives. Undergrounding is proposed in four locations, including through the Dedham Vale National Landscape and part of its setting. The Dedham Vale National Landscape is a nationally important and designated landscape. With the proposed underground cable, the effects on views and setting will be reduced. Prior to the commencement of construction works for the Project, several existing overhead and underground third-party services would need to be diverted, removed, undergrounded, or protected. The Project would follow the route of existing 132 kV overhead lines north of Flowton and north of Mellis, where

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		the existing 132 kV overhead lines would be undergrounded. This would help to reduce landscape and visual effects. The Project allows for the use of full line tension gantries at CSE compounds and substations (where design allows). The use of full tension gantries removes the need for a bulkier terminal pylon adjacent to the CSE compound which would reduce visual clutter and therefore help to reduce landscape and visual effects. The Project allows for landscape planting around CSE compounds, the new EACN Substation, south of the new Tilbury North Substation and the existing Norwich Main Substation and its extension. These are presented as 'Environmental Areas' on ES Figure 4.1: Proposed Project Design (document reference 6.4.F1) and ES Figure 4.2: Proposed Project Design – Permanent Features (document reference 6.4.F2). Further details including landscape plans and planting schedules are provided in the Outline LEMP (document reference 7.4). Replacement planting would be undertaken at the earliest opportunity given the right planting season to mitigate, where practicable, vegetation removed during construction. National Grid have considered the proposed materials and colour palette for the CSE compounds and new substation / substation extension, including buildings, security fencing, equipment, and surfacing to be sensitive to the environment they are located in, where practicable. Further information is included in the Design Approach for Site Specific Infrastructure (document reference 7.16).
5.10.38	The Secretary of State should consider whether requirements to the consent are needed requiring the incorporation of particular design details that are in	The measures presented in the Outline LEMP (document reference 7.4) will be secured by requirements of Schedule 3 in the draft DCO (document reference 3.1).

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	keeping with the statutory and technical requirements for landscape and visual impacts.	
5.11	**Land Use, Including Open Space, Green Infrastructure, and Green Belt**	
5.11.1	An energy infrastructure project will have a direct effect on the existing use of the proposed site and may have indirect effects on the use, or planned use, of land in the vicinity for other types of development. Given the likely locations of energy infrastructure projects there may be particular effects on open space including green and blue infrastructure.	Noted.
5.11.3	Although the re-use of previously developed land for new development can make a major contribution to sustainable development by reducing the amount of countryside and undeveloped greenfield land that needs to be used, it may not be possible for many forms of energy infrastructure.	Noted.
5.11.4	Development of land will affect soil resources, including physical loss of and damage to soil resources, through land contamination and structural damage. Indirect impacts may also arise from changes in the local water regime, organic matter content, soil biodiversity and soil process.	Noted.
5.11.5	Where pre-existing land contamination is being considered within a development, the objective is to ensure that the site is suitable for its intended use. Risks would require consideration in accordance with the contaminated land statutory guidance as a minimum.	Noted.
5.11.6	The government's policy is to ensure there is adequate provision of high-quality open space and sports and recreation facilities to meet the needs of local communities. Connecting people with open spaces,	Noted.

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	sports and recreational facilities all help to underpin people's quality of life and have a vital role to play in promoting healthy living.	
5.11.7	Green and blue infrastructure can also enable developments to provide positive environmental, social, health and economic benefits. Green infrastructure includes green space such as parks and woodlands but also other environmental features such as street trees, hedgerows and green walls and roofs. It also includes blue infrastructure such as canals, rivers, streams, ponds lakes and their borders. Well designed and managed green and blue infrastructure provides multiple benefits at a range of scales. It can contribute to biodiversity recovery, sequester carbon, absorb surface water, cleanse pollutants, absorb noise and reduce high temperatures. The Green Infrastructure Framework – Principles and Standards for England can be used to consider green infrastructure in development and plan for good quality and targeted creation or improvement.	The Biodiversity Net Gain Report (document reference 7.1) sets out the proposals to improve local environmental conditions with regards to landscape and biodiversity improvements. Environmental Areas will be created around the new substations, substation extensions and the CSE compounds. The purpose of these areas is to deliver the statutory 10% biodiversity net gain enhancements but to also connect existing hedgerows and woodland, to improve green networks and enhance landscape character the Outline LEMP (document reference 7.4) details how the Environmental Areas will be created and managed.
	Applicant assessment	
5.11.8	The ES (see Section 4.3) should identify existing and proposed land uses near the project, any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan. The assessment should be proportionate to the scale of the preferred scheme and its likely impacts on such receptors. For developments on previously developed land, the applicant should ensure that they have	Appendix A of the Planning Statement (document reference 5.6.A) identifies those committed and emerging developments which interact with the Project Order Limits. A Preliminary Contamination Risk Assessment (PRA) has been undertaken and presented in ES Appendix 9.1: Baseline Information and Preliminary Contamination Risk Assessment (document reference 6.9.A1) to assess potentially contaminated land. The majority of the Order Limits and the 250 m Study Area appears to have remained as undeveloped/agricultural land since the late 1800s based on the earliest reviewed historical mapping, and supported by the

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	considered the risk posed by land contamination and how it is proposed to address this.	other data sources reviewed and described above. In these areas, it is considered that there is a very low risk of significant sources of potential contamination. However, there are discrete areas within the Study Area that have a history of potentially contaminative land use or where the current land use is potentially contaminative. Where these areas are identified, readily available information relating to the Potential Sources of Contamination (PSC) has been gathered and a preliminary contamination risk assessment has been carried for each potential contamination source.
5.11.9	Applicants will need to consult the local community on their proposals to build on existing open space, sports or recreational buildings and land. Taking account of the consultations, applicants should consider providing new or additional open space including green and blue infrastructure, sport or recreation facilities, to substitute for any losses as a result of their proposal. When considering proposals for green infrastructure, Applicant's should refer to the Green Infrastructure Framework.	The Consultation Report (document reference 5.1) provides a complete overview of the consultation and stakeholder engagement activities on the Project. Stakeholders have had an opportunity to comment on the emerging and detailed proposals as the Project design has developed. Where interactions with open space have been identified, National Grid have considered design changes to avoid or to minimise impacts. Where it has not been possible to avoid areas of open space, an assessment of the potential for loss has been included in Chapter 7 and Appendix B Open Space Assessment of the Planning Statement (document reference 5.6.B1).
5.11.10	Applicants should use any up-to-date local authority assessment or, if there is none, provide an independent assessment to show whether the existing open space, sports and recreational buildings and land is surplus to requirements	Noted.
5.11.11	During any pre-application discussions with the applicant the LPA should identify any concerns it has about the impacts of the application on land use, having regard to the development plan and relevant applications and including, where relevant, whether it	Noted.

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	agrees with any independent assessment that the land is surplus to requirements.	
5.11.12 – 5.11.13	Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5). Applicants should also identify any effects and seek to minimise impacts on soil health and protect and improve soil quality taking into account any mitigation measures proposed.	As reported in ES Chapter 6: Agriculture and Soils (document reference 6.6) the potential presence of BMV land has been assessed through reference to published information and surveys of the areas permanently affected. The assessment sets out the total area of each land grade permanently affected and estimates the likely area of land at each grade. Measures have been outlined in the Outline CoCP (document reference 7.2) and Appendix C: Outline Soil Resource Plan of the Outline CoCP (document reference 7.2) to reduce the potential negative impacts on soils which are handled and disturbed, such as those to protect the quality of soils when they are stripped, stockpiled and restored and measures to reduce the disruption to agricultural activities.
5.11.14	Applicants are encouraged to develop and implement a Soil Management Plan which could help minimise potential land contamination. The sustainable reuse of soils needs to be carefully considered in line with good practice guidance where large quantities of soils are surplus to requirements or are affected by contamination.	ES Chapter ES Chapter 6: Agriculture and Soils (document reference 6.6) considers the potential effects of the Project on agriculture and soil. Measures have been outlined in the Outline CoCP (document reference 7.2) and the Outline Soil Resource Plan (Appendix C of the Outline CoCP) to reduce the potential negative impacts on soils which are handled and disturbed, such as those to protect the quality of soils when they are stripped, stockpiled and restored and measures to reduce the disruption to agricultural activities.
5.11.15	Developments should contribute to and enhance the natural and local environment by preventing new and existing developments from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.	Pollution management measures are set out in the Outline CoCP (document reference 7.2). The Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce unacceptable levels of soil, air, water or noise pollution or land instability. With the implementation of design measures, along with other control measures set out in the Outline CoCP (document reference 7.2), potential significant adverse effects

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		of the Project during construction and operation (including maintenance) can be avoided.
5.11.16	Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.	The assessment of potential impacts on air quality arising from the Project are assed in ES Chapter 7: Air Quality (document reference 6.7). The assessment of potential impacts on water quality arising from the Project are assed in ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12). The assessment of Air Quality and Water Quality concludes that with the adoption of the good practice measures identified in the Outline CoCP (document reference 7.2) there are no likely significant residual effects in relation to air quality or water quality.
5.11.17	Applicants should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.	ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9) considers land contamination based Preliminary Contamination Risk Assessment (PRA) (ES Appendix 9.1: Baseline Information and Preliminary Contamination Risk Assessment (document reference 6.9.A1)). The PRA has identified a generally 'very low/low risk' of significant existing contamination to be present within most of the Order Limits. Good practice measures GH02 (Foundation Works Risk Assessment) and GH08 (unexpected contamination) in the Outline CoCP (document reference 7.2) are measures to reduce risks associated with contamination from the Project.
5.11.18	For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination, and where contamination is present, applicants should consider opportunities for remediation where possible. It is important to do this as early as possible as part of	ES Appendix 9.1: Baseline Information and Preliminary Contamination Risk Assessment (document reference 6.9.A1) describes the known areas where a risk of contamination has been identified based on data provided from relevant bodies. This notes that the majority of the Order Limits and Study Area appears to have remained as "undeveloped" agricultural land and farm buildings since the earliest historical mapping

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	engagement with the relevant bodies before the official pre-application stage.	reviewed, dating from the 1880s. In these areas it is considered that there is a very low risk of potential sources of significant existing contamination and therefore they are not considered further in the assessment. There are discrete areas within the Study Area that have a history of potentially contaminative land use or where the current land use is potentially contaminative. Where these areas are identified, readily available information relating to the Potential Sources of Contamination (PSC) has been gathered and a preliminary contamination risk assessment has been carried for each potential contamination source. Based on the assessment, the following sites are assessed as presenting a potential moderate or above risk to sensitive receptors from existing contamination. The locations of these sites are presented on ES Figure 9.6: Sites with a Moderate or Above Risk Classification (document reference 6.9.F6): • PSC B1 – Rookery Farm, Lion Road – Historical landfill (Section B) • PSC B5 – Bramford Substation (Section B) • PSC C23 – Former RAF Raydon (Section C) • PSC D1 – Former RAF Boxted (Section D) The Outline CoCP (document reference 7.2) sets out the measures that would be taken to deal with unexpected contamination identified during construction.
5.11.19	Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place.	A Minerals Resource and Infrastructure Assessment has been undertaken to support the assessment undertaken in ES Appendix 9.2 (document reference 6.9.A2). Large parts of the Order Limits are located within either a MSA or an MCA for sand and gravel and/or brick clay. The MSA and MCA both extend beyond the Order Limits, across substantial areas of Norfolk, Suffolk, and Greater Essex.

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		The Project will avoid and reduce effects on sensitive environmental features/receptors through its design process. The prior or incidental extraction of minerals would significantly increase the magnitude of environmental effects created by the Project and would lengthen the duration of construction works in sensitive areas, such as Dedham Vale National Landscape. The environmental impact associated with extracting the minerals is considered to be disproportionate to the value gained from extracting the minerals.
5.11.20	The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved except in very special circumstances. Applicants should therefore determine whether their proposal, or any part of it, is within an established Green Belt and if it is, whether their proposal may be inappropriate development within the meaning of Green Belt policy (see paragraph 5.11.36 below).	The Planning Statement (document reference 5.6) includes an assessment to determine whether the Project may be inappropriate development within the meaning of Green Belt policy; and if the Project (or any part of it) may be inappropriate development, and demonstrating that very special circumstances exist, meaning that the harm by reason of inappropriateness and any other harm, is outweighed by other considerations. To connect a new transmission connection into Tilbury Substation, it will be necessary to route through the Metropolitan Green Belt. National Grid has considered the effects on the Green Belt and all of the options connecting into Tilbury identified in the Corridor and Preliminary Routing and Siting Study (CPRSS) (National Grid, 2022) would result in new and upgraded infrastructure in the Green Belt. The National Electricity Transmission System (NETS) transports energy from where it is generated to where it is used, in homes, schools, hospitals, businesses, and factories. Electricity networks are an established feature in our landscapes, taking energy across open countryside to towns and cities where it is needed. To ensure the national electricity network can transport energy efficiently there are numerous electricity transmission connections crossing Green Belts. Many of these connections are by way of overhead lines. By

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		their nature, electricity transmission infrastructure (overhead lines) within the Green Belt is inevitable due to the need to transport energy around the country and the need to avoid the most built-up areas around our towns and cities (Holford Rule Supplementary Note 1). Some electricity infrastructure such as overhead lines, are considered to be engineering operations. By the nature of their design, and the sensitive siting, some of this infrastructure such as pylons and conductors may not be considered inappropriate development in the Green Belt as they do not conflict with Green Belt purposes and preserve openness. Although overhead lines may occupy long corridors within Green Belt, they involve little physical change to the land through which they pass and leave a large majority of the land beneath them free from development and therefore open. Notwithstanding the above, the NPS EN-1 Paragraph 4.2.16 sets out that where a Project is CNP Infrastructure the Secretary of State will take as a starting point for decision making that that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. NPS EN-1 Paragraph 4.2.17 identifies that this assumption includes where development is within a Green Belt and requires very special circumstances to justify development. The very special circumstances are identified within the Green Belt assessment contained within Chapter 7 of the Planning Statement (document reference 5.6).
5.11.21	However, infilling or redevelopment of major developed sites in the Green Belt, if identified as such by the local planning authority, may be suitable for energy infrastructure. It may help to secure jobs and prosperity without further prejudicing the Green Belt or offer the	Noted.

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	opportunity for environmental improvement. Applicants should refer to relevant criteria on such developments in Green Belts.	
5.11.22	Moreover an applicant may be able to demonstrate that particular energy infrastructure, such as an underground pipeline, may be considered an “engineering operation” and regarded as not inappropriate in Green Belt. This is provided it preserves the openness of the Green Belt and does not conflict with the purposes of Green Belt designation. It may also be possible for an applicant to show that the physical characteristics of a proposed overhead line in a particular location would not have so harmful an impact as to conflict with the purposes of Green Belt designation, or with other protections of rural landscape.	The Planning Statement (document reference 5.6) sets out that some electricity infrastructure such as overhead lines, are considered to be engineering operations. By the nature of their design, and the sensitive siting, some of this infrastructure such as pylons and conductors may not be considered inappropriate development in the Green Belt as they do not conflict with Green Belt purposes and preserve openness. Although overhead lines may occupy long corridors within Green Belt, they involve little physical change to the land through which they pass and leave a large majority of the land beneath them free from development and therefore open.
	Mitigation	
5.11.23	Although in the case of most energy infrastructure there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site (assuming that some of that use can still be retained post project construction) applicants should nevertheless seek to minimise these effects and the effects on existing or planned uses near the site by the application of good design principles, including the layout of the project and the protection of soils during construction.	The Project design is the result of an iterative process which will avoid, reduce and mitigate potential environmental effects. The Design Development Report (document reference 5.15) and ES Chapter 3: Alternatives (document reference 6.3) sets out how the Project has evolved from a concept, through strategic options, route corridors and indicative alignments to the Project presented within the application for development consent. ES Chapter 4: Project Description (document reference 6.4) outlines how the Project has continued to avoid sensitive features through embedded measures within the design. With regard to soil quality, proposed soil handling measures are set out in the Outline CoCP (document reference 7.2), and accompanying Outline Soil Resource Plan (Appendix C of the Outline CoCP) to reduce the potential negative impacts on soils which are handled and disturbed, such as those to protect

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		the quality of soils when they are stripped, stockpiled and restored. Measures are also proposed to reduce the disruption to agricultural activities - for example, AS01 (Soil Management Measures) and AS05 (consultation with affected landowners), with all land required temporarily being returned to its preconstruction condition. The commitments in the Outline CoCP will be secured by Requirement 4 of Schedule 3 in the Draft DCO (document reference 3.1).
5.11.24	Where green infrastructure is affected, the Secretary of State should consider imposing requirements to ensure the functionality and connectivity of the green infrastructure network is maintained in the vicinity of the development and that any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space including appropriate access to National Trails and other public rights of way and new coastal access routes.	In the case of Open Space specifically, the Project has taken a precautionary approach to the identification of potential open space. An assessment of the Project impacts on Open Space is presented in Chapter 7 and Appendix B of the Planning Statement (document reference 5.6). In the case of green infrastructure assets, the Project will avoid as far as possible impacts to such green infrastructure assets, and the ES has determined that there are no significant long-term effects which are relevant in this respect. As reported in ES Chapter 15: Socio Economics and Recreation (document reference 6.15) there will be temporary closure and diversion resulting in over 500 m increase in journey length of eight Public Rights of Way (PRoW) (footpaths and bridleway) within Mid Suffolk, Colchester, Chelmsford and Brentwood Mitigation and management measures have been devised to avoid and/or reduce the adverse effects on PRoW, which are set out in the Outline Public Rights of Way Management Plan (document reference 7.6).
5.11.25	The Secretary of State should also consider whether any adverse effect on green infrastructure and other forms of open space is adequately mitigated or compensated by means of any planning obligations, for example exchange land and provide for appropriate management and maintenance agreements. Any exchange land should be at least as good in terms of	See responses to 5.11.24 and 5.11.9 – 5.11.10.

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	size, usefulness, attractiveness and quality, and accessibility.	
5.11.26	Alternatively, where sections 131 and 132 of the Planning Act 2008 apply, replacement land provided under those sections will need to conform to the requirements of those sections	As reported in the Special Category Land Report (document reference 4.1.AC) The Project is seeking powers for the compulsory acquisition of rights for both Common Land and Open Space Land. In respect of both Common Land and Open Space Land, the rights sought will not impact the use or function of the common land or open space land when compared to its current use, and therefore the land is no less advantageous when burdened with these rights.
5.11.27	Existing trees and woodlands should be retained wherever possible. In the EIP, the Government committed to increase the tree canopy and woodland cover to 16.5% of total land area of England by 2050. The applicant should assess the impacts on, and loss of, all trees and woodlands within the Project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long-term management and maintenance of newly planted trees should be secured.	The Project has been designed in a way which prioritises the retention of vegetation wherever practicable in accordance with good practice measures as outlined within the Outline CoCP (document reference 7.2). Owing to the size of the Project it has not been possible to completely avoid the loss of such natural features. The Outline LEMP (document reference 7.4) sets out the principal measures that are required to help avoid, minimise, mitigate and compensate (where relevant) the impacts to vegetation. ES Appendix 13.6: Arboricultural Impact Assessment (document reference 6.13.A6) identifies trees which may be affected by the Project, and to provide information on their locations, quantity, and quality. Retained trees will be protected during construction in accordance with the measures set out in BS 5837:2012 and BS 3998:2010 Tree work recommendations. Tree protection measures and good practice measures to be implemented during construction are set out in Section 7 of the Outline LEMP (document reference 7.4). Where reasonably practicable, construction elements will be kept to the strict

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		minimum required and micro-sited to avoid impacts on ecologically important features. Temporary impact to habitats such as gaps in hedgerows to allow for construction access would be reinstated in line with the habitat reinstatement principles set out in Chapter 9 of the Outline LEMP (document reference 7.4). Mitigation for the permanent loss of habitat would be delivered through the creation / enhancement of habitat associated with BNG for the Project. Within the Order Limits six areas of land (defined as Environmental Areas) are proposed around the Project's permanent assets, where there is sufficient space. To ensure the BNG target is reached, any additional creation / enhancement would be delivered outside of the Order Limits, as identified in the Biodiversity Net Gain Report (document reference 7.1). National Grid has committed to a 3:1 replacement for individual trees and trees within groups. The tree planting strategy will prioritise replanting within the Order Limits, offsite provision may however be required. Section 9.3 of the Outline LEMP (document reference 7.4) sets out the strategy for reinstatement of woodland, small groups and individual trees.
5.11.28	Where a proposed development has an impact upon a Mineral Safeguarding Area (MSA), the Secretary of State should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources.	A Minerals Resource and Infrastructure Assessment has been undertaken to support the assessment undertaken and is presented in ES Appendix 9.2 (document reference 6.9.A2). Large parts of the Order Limits are located within either a MSA or an MCA for sand and gravel and/or brick clay. The MSA and MCA both extend beyond the Order Limits, across substantial areas of Norfolk, Suffolk, and Greater Essex. The Project has sought to avoid and reduce effects on sensitive environmental features/receptors through its design process. The prior or incidental extraction of minerals would significantly increase the magnitude of environmental effects created by the Project and would lengthen the duration of

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		construction works in sensitive areas, such as Dedham Vale National Landscape. The environmental impact associated with extracting the minerals is considered to be disproportionate to the value gained from extracting the minerals
5.11.29	Where a project has a sterilising effect on land use (for example in some cases under transmission lines) there may be scope for this to be mitigated through, for example, using or incorporating the land for nature conservation or wildlife corridors or for parking and storage in employment areas.	No sterilising effects on land use are anticipated as a result of the Project. Unless otherwise identified for embedded or mitigation areas, landowners will still be able to farm beneath the overhead lines and above the underground cable. As reported in ES Chapter 6: Agriculture and Soils (document reference 6.6) no likely significant effects on agricultural operations and viability are anticipated during operation. As identified in ES Appendix 9.2: Qualitative Minerals Resource and Infrastructure Assessment (document reference 6.9.A2), the quantity of mineral sterilised by the Project is considered to be insignificant in the context of the extensive occurrence of sand and gravel within the counties of Essex and Suffolk and the national need/significance of the Project. The Outline LEMP (document reference 7.4) sets out how land use would be reinstated following construction, including reinstatement of habitats.
5.11.30	Public Rights of way, National Trails, and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders. The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve or create new access. In considering revisions to an existing right of way, consideration should be given to the use, character, attractiveness, and convenience of the right of way. provisions in respect of these measures	A number of temporary diversions and crossing points are required for PRoW affected by the construction of the Project. The Outline PRoW Management Plan (document reference 7.6) explains the details of the temporary short-term diversions and appropriate measures for the management of PRoW during the various stages of the Project.

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	should be included in any grant of development consent.	
5.11.31	The Secretary of State should consider whether the mitigation measures put forward by an applicant are acceptable and whether requirements or other provisions in respect of these measures should be included in any grant of development consent	In line with national policy requirements, the Project has been designed following the mitigation hierarchy. The mitigation hierarchy is a stepped process that helps development projects to address potentially adverse impacts on the environment As described in ES Chapter 5: EIA Approach and Method (document reference 6.5) the mitigation hierarchy has been applied to the Project throughout the iterative design process and with the following considered: • Avoid – the first step of the mitigation hierarchy comprises mitigation measures taken to avoid creating impacts from the outset, such as careful spatial placement of infrastructure away from receptors, or timing construction sensitively to avoid their disturbance • Prevent – these include measures to remove the impact at source or disrupt the impact pathway – such as adopting standard pollution prevention techniques in line with good practice to prevent watercourses becoming polluted • Reduce – these are measures taken to reduce the duration, intensity and/or extent of impacts that cannot be completely avoided for example landscape planting around the permanent assets such as at the CSE compounds and the proposed new EACN Substation and Tilbury North Substation • Offset (sometimes referred to as compensate) – where relevant and appropriate to the specific impact, these measures aim to compensate for any residual, adverse impacts after full implementation of the previous three steps of the mitigation hierarchy an example is individual tree replacement at a 3:1 ratio with some inside the Order Limits where space allows and some outside of the Order Limits.

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		The application of the Mitigation Hierarchy is reported across a number of documents which have been submitted as part of the application for development consent. The mitigation hierarchy has been applied throughout development of the Project as part of the iterative EIA process which has informed the routeing and siting process. The Project has been designed to avoid, reduce or mitigate potentially significant adverse residual effects.
	Secretary of State decision making	
5.11.32	The Secretary of State should not grant consent for development on existing open space, sports and recreational buildings and land unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be surplus to requirements or the Secretary of State determines that the benefits of the project (including need), outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities.	An Open Space Assessment is presented in Chapter 7 and Appendix B of the Planning Statement (document reference 5.6). The Project has taken a precautionary approach to the identification of potential open space.
5.11.34	The Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.	As reported in ES Chapter 6: Agriculture and Soils (document reference 6.6) the potential presence of BMV land has been assessed through reference to published information and surveys of the areas permanently affected. The assessment sets out the total area of each land grade permanently affected and estimates the likely area of land at each grade. Measures have been outlined in the Outline CoCP (document reference 7.2) and Appendix C: Outline Soil Resource Plan of the Outline CoCP (document reference 7.2) to reduce the potential negative impacts on soils which are handled and disturbed, such as those to protect the quality of soils when they are

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		stripped, stockpiled and restored and measures to reduce the disruption to agricultural activities. During construction there would be a loss of BMV land (ALC Grades 1, 2 and 3a) from agricultural productivity. It is calculated that 3461 ha of agricultural land would be temporarily removed from agricultural production during construction. Of this, 2923 ha (84.4%) are mapped as Grades 1, 2 and 3a and as such the temporary removal is considered to have a temporary negative effect which would be significant. During operation (and maintenance), there would be a permanent loss of areas of agricultural land required for permanent infrastructure. The assessment reported ES Chapter 6: Agriculture and Soils (document reference 6.6) states this this permanent loss equates to approximately 172.7 hectares of Grade 1, Grade 2 and Grade 3a agricultural land (i.e., BMV land) would be taken out of agricultural production permanently. The Project minimises impacts on BMV agricultural land as far as practicable and includes mitigation measures to reduce impacts on the soil resource. The permanent loss of BMV land is considered necessary on the basis that there is urgent need for CNP Infrastructure such as the Project. The routeing and siting selection process confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Project
5.11.38	In England, Local Green Spaces may be designated locally in Local Plans and Neighbourhood Plans. These enjoy the same protection as Green Belt in England and the Secretary of State should adopt a similar approach.	In line with national policy requirements, the Project has been designed following the mitigation hierarchy and has avoided impacts where possible through the routeing and siting process. Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features as far as reasonably practicable.

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		The Project does cross two area of local green spaces designated in the adopted Ardleigh Neighbourhood Plan. The local green space at Glebe Corner will be subject to undergrounding existing UKPN overhead line infrastructure. These works will result in a temporary impact on this local green space. The local green space at the fishing lake north of Colchester Road is oversailed by the Project. For safety considerations this will prevent fishing activities. An assessment of this loss is reported in Appendix B: Open Space Assessment in the Planning Statement (document reference 5.6.B) The Design Development Report (document reference 5.15) outlines the alternative alignments which were considered to avoid oversailing the area of local green space. Alternatives to avoid oversail of the water body, to allow continuation or intensification of angling were considered. These would necessitate multiple changes of direction, give routeing constraints and the presence of residential properties, whether passing to the east (residential properties within 200 m) or west (residential properties within around 100 m) of the water body. These multiple angle changes would reduce consistency with the Holford Rules and increase effects to multiple residential properties close to the alignment in this area. Due to the limited and informal level of angling activity and the additional environmental effects from the alternatives, retain the straighter 2023 preferred draft alignment and oversail the waterbody was preferred although recognising that this would terminate the informal angling arrangements. Acknowledging that local green spaces enjoy the same protection as Green Belt in England; National Grid have stated that their position in the Planning Statement (document reference 5.6) that overhead lines comprise an engineering operation and should be regarded as not inappropriate in the Green Belt. However, were this approach to be challenged it is

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		considered that the Need Case for the Project presented in the Strategic Options Backcheck and Review (document reference 7.17) demonstrates the very special circumstances for the Project.
5.12	**Noise and Vibration**	
5.12.2	The Government's policy on noise is set out in the Noise Policy Statement for England. It promotes good health and good quality of life through effective noise management. Similar considerations apply to vibration, which can also cause damage to buildings. In this section, in line with current legislation, references to "noise" below apply equally to the assessment of impacts of vibration.	ES Chapter 2: Key Legislation and Planning Policy Context (document reference 6.2) sets out the key overarching policy relevant to the Project. An assessment on the effects from noise is included within ES Chapter 14: Noise and Vibration (document reference 6.14).
	Applicant assessment	
5.12.6 – 5.12.7	Where noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment: • a description of the noise generating aspects of the development proposal leading to noise impacts, including the identification of any distinctive tonal characteristics, if the noise is impulsive, whether the noise contains particular high or low frequency content or any temporal characteristics of the noise • identification of noise sensitive receptors and noise sensitive areas that may be affected • the characteristics of the existing noise environment • a prediction of how the noise environment will change with the proposed development – in the shorter term, such as during the construction period	Operational noise from overhead lines is scoped out of the ES, in accordance with the Scoping Opinion (document reference 6.20), on the basis that a low noise conductor system is proposed. However, additional information regarding operational noise impacts from the overhead lines is provided for information in ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) (document reference 6.14.A5). ES Chapter 14: Noise and Vibration (document reference 6.14) includes an assessment of the likely significant effects from noise and vibration from the Project, including those associated with potential working at night during the construction of the Project. The Outline CoCP (document reference 7.2) contains a list of relevant standard mitigation measures and best practicable means (BPM) relating to Noise and Vibration which would lead to negligible to small magnitude of impact of construction noise.

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	– in the longer term, during the operating life of the infrastructure – at particular times of the day, evening and night (and weekends) as appropriate, and at different times of year • an assessment of the effect of predicted changes in the noise environment on any noise-sensitive receptors, including an assessment of any likely impact on health and quality of life / well-being where appropriate, particularly among those disadvantaged by other factors who are often disproportionately affected by noise-sensitive areas • if likely to cause disturbance, an assessment of the effect of underwater or subterranean noise • all reasonable steps taken to mitigate and minimise potential adverse effects on health and quality of life The nature and extent of the noise assessment should be proportionate to the likely noise impact.	
5.12.8	Applicants should consider the noise impact of ancillary activities associated with the development, such as increased road and rail traffic movements, or other forms of transportation.	ES Chapter 14: Noise and Vibration (document reference 6.14) presents the assessment of the likely significant noise and vibration effects that could result from the construction of the Project. The Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects. Further information is also provided in ES Appendix 14.2: Construction Traffic Noise Assessment (document reference 6.14.A2).
5.12.9	Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards and other guidance. Further information on assessment of particular noise sources may be contained in the technology specific NPSs. In particular, for renewables (EN-3) and electricity	Operational noise from overhead lines is scoped out of the ES, in accordance with the Scoping Opinion (document reference 6.20), on the basis that a low noise conductor system is proposed. However, additional information regarding operational noise impacts from the overhead lines is provided

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	networks (EN-5) there is assessment guidance for specific features of those technologies. For the prediction, assessment and management of construction noise, reference should be made to any relevant British Standards264 and other guidance which also give examples of mitigation strategies.	for information in ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) (document reference 6.14.A5).
5.12.10	Some noise impacts will be controlled through environmental permits and parallel tracking is encouraged where noise impacts determined by an environmental permit interface with planning issues (i.e. physical design and location of development). The applicant should consult the EA and/or the SNCB, and other relevant bodies, such the MMO or NRW, as necessary, and in particular regarding assessment of noise on protected species or other wildlife. The results of any noise surveys and predictions may inform the ecological assessment. The seasonality of potentially affected species in nearby sites may also need to be considered.	ES Chapter 14: Noise and Vibration (document reference 6.14) presents the assessment of the likely significant noise and vibration effects that could result from the construction of the Project. The Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects. The assessment concluded with the relevant standard mitigation measures and best practicable means (BPM) set out in Appendix F: Outline Noise and Vibration Management Plan to the Outline CoCP (document reference 7.2) relating to noise and vibration the residual effect of construction noise will not be significant to all nearby NSRs during both daytime and nighttime periods. Further detailed construction noise and vibration assessments will be undertaken by the main works contractor(s) prior to commencing works. Operational noise from overhead lines is scoped out of the ES, in accordance with the Scoping Opinion (document reference 6.20), on the basis that a low noise conductor system is proposed. However, additional information regarding operational noise impacts from the overhead lines provided for information in ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) (document reference 6.14.A5). The effects of noise from the Project on ecological receptors are considered in ES Chapter 8: Ecology and Biodiversity (document reference 6.8) using supporting data from ES Chapter 14: Noise and Vibration (document reference 6.14).

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5.12.12	Applicants should submit a detailed impact assessment and mitigation plan as part of any development plan, including the use of noise mitigation and noise abatement technologies during construction and operation.	ES Chapter 14: Noise and Vibration (document reference 6.14) includes an assessment of the likely significant effects from noise and vibration from the Project, including those associated with potential working at night during the construction of the Project. The Outline CoCP (document reference 7.2) contains a list of relevant standard mitigation measures and best practicable means (BPM) relating to Noise and Vibration which would lead to negligible to small magnitude of impact of construction noise. Operational noise from overhead lines is scoped out of the ES, in accordance with the Scoping Opinion (document reference 6.20), on the basis that a low noise conductor system is proposed. However, additional information regarding operational noise impacts from the overhead lines provided for information in ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) (document reference 6.14.A5).
	Mitigation	
5.12.13	The Secretary of State should consider whether mitigation measures are needed both for operational and construction noise over and above any which may form part of the project application. In doing so the Secretary of State may wish to impose mitigation measures. Any such mitigation measures should take account of the NPPF or any successor to it and the Planning Practice Guidance on Noise.	ES Chapter 14: Noise and Vibration (document reference 6.14) includes an assessment of the likely significant effects from noise and vibration from the Project. The Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects in accordance with Paragraph 4.7.3 of NPS EN-1. With the implementation of design measures, along with other control measures, potential significant adverse effects of the Project at NSR during construction and operation (including maintenance) can be avoided. The Outline CoCP (document reference 7.2) contains a list of relevant standard mitigation measures and best practicable means (BPM) relating to Noise and Vibration.
5.12.14	Mitigation measures may include one or more of the following: • engineering: reducing the noise generated at source and/or containing the noise generated • lay-out: where possible, optimising the distance between the source and noise sensitive receptors and/or incorporating good design to minimise noise	

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	transmission through the use of screening by natural or purpose-built barriers, or other buildings • administrative: using planning conditions/obligations to restrict activities allowed on the site at certain times and/or specifying permissible noise limits/ noise levels, differentiating as appropriate between different times of day, such as evenings and late at night, and taking into account seasonality of wildlife in nearby designated sites • insulation: mitigating the impact on areas likely to be affected by noise including through noise insulation when the impact is on a building.	The construction mitigation measures proposed are set out in commitment reference NV01 to NV07 in the Outline CoCP (document reference 7.2). The Main Works Contractor(s) would conduct detailed construction noise assessments to determine whether there are likely to be any new or different significant adverse effects at noise and vibration sensitive receptors (NSRs) and therefore whether additional measures, including site-specific BPM, may be required. The Outline Noise and Vibration Management Plan (NVMP) (Appendix F of the Outline CoCP (document reference 7.2)) would be updated into a Noise and Vibration Management Plan, incorporating the findings of their detailed assessment and associated site-specific mitigation.
5.12.15	The project should demonstrate good design through selection of the quietest or most acceptable cost-effective plant available; containment of noise within buildings wherever possible, taking into account any other adverse impacts that such containment might cause (e.g. on landscape and visual impacts; optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission).	Operational noise from overhead lines is scoped out of the ES, in accordance with the Scoping Opinion (document reference 6.20), on the basis that a low noise conductor system is proposed. However, information on noise from overhead lines is provided in ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) (document reference 6.14.A5). ES Chapter 14: Noise and Vibration (document reference 6.14) includes an assessment of the likely significant effects from noise and vibration from the Project, including those associated with potential working at night during the construction of the Project. The CoCP (document reference 7.2) contains a list of relevant standard mitigation measures and best practicable means (BPM) relating to Noise and Vibration which would lead to negligible to small magnitude of impact of construction noise.
5.12.16	A development must be undertaken in accordance with statutory requirements for noise. Due regard must be given to the relevant sections of the Noise Policy Statement for England, the NPPF, and the government's associated planning guidance on noise. In	The assessment of noise and vibration effects describe in ES Chapter 14: Noise and Vibration (document reference 6.14) has due regard for the relevant sections of the NPPF and the government's associated planning guidance.

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	Wales the relevant policy will be PPW and the TANs, as well as the Welsh Government's Noise and Soundscape Action Plan.	
	Secretary of State decision making	
5.12.17	The Secretary of State should not grant development consent unless they are satisfied that the proposals will meet the following aims, through the effective management and control of noise: • avoid significant adverse impacts on health and quality of life from noise • mitigate and minimise other adverse impacts on health and quality of life from noise • where possible, contribute to improvements to health and quality of life through the effective management and control of noise	ES Chapter 10: Health and Wellbeing (document reference 6.10) includes an assessment of the likely significant effects from noise and vibration referenced in ES Chapter 14: Noise and Vibration (document reference 6.14) during the construction and operation of the Project. This has identified that there would be no residual effects on health and quality of life from noise with the good practice measures and mitigation in place.
5.12.18	When preparing the Development Consent Order, the Secretary of State should consider including measurable requirements or specifying the mitigation measures to be put in place to ensure that noise levels do not exceed any limits specified in the development consent. These requirements or mitigation measures may apply to the construction, operation, and decommissioning of the energy infrastructure development	Operational noise from overhead lines is scoped out of the ES, in accordance with the Scoping Opinion (document reference 6.20), on the basis that a low noise conductor system is proposed. However, information on noise from overhead lines is provided in ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) (document reference 6.14.A5). ES Chapter 14: Noise and Vibration (document reference 6.14) includes an assessment of the likely significant effects from noise and vibration from the Project, including those associated with potential working at night during the construction of the Project. The Outline CoCP (document reference 7.2) contains a list of relevant standard mitigation measures and best practicable means (BPM) relating to Noise and Vibration which would lead to negligible to small magnitude of impact of construction noise.

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5.13	**Socio-Economic Impacts**	
	Applicant assessment	
5.13.2	Where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts as part of the ES (see Section 4.3).	ES Chapter 15: Socio-economics, Recreation and Tourism (document reference 6.15) includes an assessment of the Project effects on: • Employment, economic activity and tourism economy during construction • Disruption of access to community facilities during construction and operation (and maintenance). This excludes visual amenity, which is considered in ES Chapter 13: Landscape and Visual (document reference 6.13) • Disruption to businesses during construction and operation (and maintenance). This excludes potential effects on agricultural businesses, which are considered under ES Chapter 6: Agriculture and Soils (document reference 6.6) • Disruption to tourism, recreational assets and open space during construction and operation (and maintenance) • Pressures on local visitor accommodation during construction • Severance and 'sterilisation' of land in the context of its potential for future development during construction and operation (and maintenance) This chapter should be read in conjunction with the following report: • ES Appendix 15.1: Built and Other Assets within the 3 km Study Area (document reference 6.15.A1)
5.13.3	The applicant is strongly encouraged to engage with relevant local authorities during early stages of project development so that the applicant can gain a better	The socio-economic, recreation and tourism technical discipline have engaged in a series of thematic meetings with the relevant local authorities. The thematic meetings provided an opportunity for the local planning authorities to raise

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	understanding of local or regional issues and opportunities.	questions and concerns as well as discussing important points of local context to inform the assessment. Further details regarding consultation are detailed in Section 15.3 of ES Chapter 15: Socio-economics, Recreation and Tourism (document reference 6.15).
5.13.4	The applicant's assessment should consider all relevant socio-economic impacts, which may include: • the creation of jobs and training opportunities. Applicants may wish to provide information on the sustainability of the jobs created, including where they will help to develop the skills needed for the UK's transition to Net Zero • the contribution to the development of low-carbon industries at the local and regional level as well as nationally • the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities • any indirect beneficial impacts for the region hosting the infrastructure, in particular in relation to use of local support services and supply chains • effects (positive and negative) on tourism and other users of the area impacted • the impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure. This could change the local population dynamics and could alter the demand for services and facilities in the settlements nearest to the construction work (including community facilities and physical infrastructure such as energy, water, transport and waste). There could also be effects on	ES Chapter 15: Socio-economics, Recreation and Tourism (document reference 6.15) includes an assessment of the Project effects on socio-economics, recreation and tourism that could arise from the construction and operation (including maintenance) of the Project. The majority of construction activities would require trained specialists who are qualified to work on high voltage electricity lines. These are typically sourced from National Grid's existing pool of approved contractors. However, from experience with other National Grid Projects, it is likely that a minimum of 10% of the workforce would be sourced from the local labour market. These could, for example, have less specialist roles such as security workers and delivery drivers. This level of local employment, based on the assumption of approximately 4,800 construction employment throughout the four-year construction period, could result in a total job demand of approximately 480 jobs local jobs locally. Tourism is a key contributor to the local economy, providing employment for the local workforce. During the construction phase, there is potential for temporary impacts arising from changes in air quality (e.g., dust), noise levels, visual amenity, and traffic congestion, which may influence tourists' perception of the area. Due to the linear nature of the Project, these potential impacts are expected to be short-term in most locations and confined to the construction phase. The construction good practices and mitigation measures in the Outline CoCP (document reference 7.2) and Outline Construction Traffic Management Plan (CTMP) (document

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	social cohesion depending on how populations and service provision change as a result of the development • cumulative effects - if development consent were to be granted to for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region	reference 7.3) are anticipated to mitigate these potential effects. The measures in both of these management plans will be secured by Requirement 4 of Schedule 3 of the draft DCO (document reference 3.1). With these measures implemented, the potential impact on the tourism economy is expected to be low. Considering the medium sensitivity of the local economy, the potential effects on the tourism economy within the Wider Study Area during construction are assessed as temporary, short-term, negligible adverse and not significant. ES Chapter 17: Cumulative Effects (document reference 6.17) considers the effects in combination with other proposed developments (inter-project).
5.13.5	Applicants should describe the existing socio-economic conditions in the areas surrounding the proposed development and should also refer to how the development's socio-economic impacts correlate with local planning policies.	ES Chapter 15: Socio-economics, Recreation and Tourism (document reference 6.15) presents the existing socio-economic conditions in the Local, 3 km and Wider Study Areas surrounding the Project. Relevant planning policy is identified in Section 15.2.
5.13.6	Socio-economic impacts may be linked to other impacts, for example visual impacts considered in Section 5.10 but may also have an impact on tourism and local businesses. Applicants are encouraged, where possible, to demonstrate that local suppliers have been considered in any supply chain.	ES Chapter 15: Socio-economics, Recreation and Tourism (document reference 6.15) includes an assessment of the Project effects on socio-economics, recreation and tourism that could arise from the construction and operation (including maintenance) of the Project. This includes an assessment of impacts on the integrity of tourist attractions and business premises, the impact on jobs in the supply chain during the construction phase, and the impact of changing influx of construction workers on the availability of local accommodation facilities.
5.13.7	Applicants should consider developing accommodation strategies where appropriate, especially during construction and decommissioning phases, that would	ES Chapter 15: Socio-economics, Recreation and Tourism (document reference 6.15) includes an assessment of the Project effects on socio-economics, recreation and tourism that

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	include the need to provide temporary accommodation for construction workers if required.	could arise from the construction and operation (including maintenance) of the Project. During construction and decommissioning there would be sufficient capacity to accommodate the workforce for the Project.
	Mitigation	
5.13.8	The Secretary of State should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development. For example, high quality design can improve the visual and environmental experience for visitors and the local community alike.	The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce socio-economic, recreation and tourism impacts and effects through the process of design development. This has included: • Sensitive routing and siting of infrastructure and temporary works to avoid or reduce impacts on socio-economic, recreation and tourism receptors • The Project will be constructed in compliance with the required Environmental Control Plans (ECPs). Those anticipated to be required, at this stage include: – Appendix B Outline Construction Worker Travel Plan of the Outline Construction Traffic Management Plan (document reference 7.3) – S01: Provision of training to construction workers, particularly in relation to working hours and the management of emissions (dust, noise, vibration, etc). – S02: PRoWs crossing the working areas will be managed in discussion with the relevant local authorities and potential temporary closures and diversions applied, where required. Temporary closures and diversions will be kept to a temporal minimum, and that, where practicable alternative routes are maintained. Access disruption would be reduced while construction activities occur where practicable. Any required

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		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. Management of PRoW during construction is detailed in the Outline PRoW Management Plan (document reference 7.6). – S05: National Grid would seek to work with event organisers to minimise disruption to events, such as the Little Bromley 10 km Run, Corbeau Seats Rally, Tour de Tendring, and Ford Ride London-Essex 100. Given the uncertainty surrounding whether the events would proceed as planned, event organisers are encouraged to contact National Grid in advance of their event to ensure effective coordination and support. Further control and management measures have also been incorporated into the Outline CoCP (document reference 7.2) to mitigate any adverse socio-economic, recreation and tourism effects. The Outline CoCP will be secured by Requirement 4 of Schedule 3 of the draft DCO (document reference 3.1).
	Secretary of State decision making	
5.13.9	The Secretary of State should have regard to the potential socio-economic impacts of new energy infrastructure identified by the applicant and from any other sources that the Secretary of State considers to be both relevant and important to its decision.	ES Chapter 15: Socio-economics, Recreation and Tourism (document reference 6.15) includes an assessment of the Project effects on socio-economics, recreation and tourism that could arise from the construction and operation (including maintenance) of the Project. The majority of construction activities would require trained specialists who are qualified to work on high voltage electricity lines. These are typically sourced from National Grid's existing pool of approved contractors. However, from experience with other National Grid projects, it is likely that a minimum of 10% of the workforce would be sourced from the local labour

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		market. These could, for example, have less specialist roles such as security workers and delivery drivers. This level of local employment, based on the assumption of approximately 4,800 construction employment throughout the four-year construction period, could result in a total job demand of approximately 480 jobs local jobs locally. Tourism is a contributor to the local economy, providing employment for the local workforce. During the construction phase, there is potential for temporary impacts arising from changes in air quality (e.g., dust), noise levels, visual amenity, and traffic congestion, which may influence tourists' perception of the area. Due to the linear nature of the Project, these potential impacts are expected to be short-term in most locations and confined to the construction phase. The construction good practices and mitigation measures in the Outline CoCP (document reference 7.2) and Outline CTMP (document reference 7.3) are anticipated to mitigate these potential effects. With these measures implemented, the potential impact on the tourism economy is expected to be low. Considering the medium sensitivity of the local economy, the potential effects on the tourism economy within the Wider Study Area during construction are assessed as temporary, short-term, negligible adverse and not significant.
5.13.10	The Secretary of State may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence (particularly in view of the need for energy infrastructure as set out in this NPS).	Noted. Assertion of socio-economic impacts are supported by evidence presented in ES Chapter 15: Socio-economics, Recreation and Tourism (document reference 6.15).
5.13.11 and 5.13.12	The Secretary of State should consider any relevant positive provisions the applicant has made or is proposing to make to mitigate impacts (for example through planning obligations) and any legacy benefits	National Grid promotes the use of local supply and small/medium enterprises through main contractors by embedded targets within its framework contracts. National Grid will continue to work with relevant planning authorities and

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	that may arise as well as any options for phasing development in relation to the socio-economic impacts. The Secretary of State may wish to include a requirement that specifies the approval by the local authority of an employment and skills plan detailing arrangements to promote local employment and skills development opportunities, including apprenticeships, education, engagement with local schools and colleges and training programmes to be enacted.	business leaders at a national, regional and local level to identify opportunities to invest in employment networks, including looking for opportunities to work with local businesses. ES Chapter 15: Socio-economics, Recreation and Tourism (document reference 6.15) notes that given the relatively low numbers of construction workers to be employed on the Project across the approximate 180 km route, and the requirement for workers on to be experienced in working on high voltage electricity lines, the potential impact on jobs and employment is likely to be very low and beneficial in magnitude. With a medium sensitivity on the local economy, the potential effects on jobs and employment within the Wider Study Area during construction would be temporary, short-term, negligible beneficial and not significant. As such, National Grid has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at a project level, as this is not considered to be an efficient or effective approach given the number of construction workers anticipated, and that National Grid has not identified any likely significant effects in relation to construction employment.
5.14	**Traffic and Transport**	
	Applicant assessment	
5.14.5	If a project is likely to have significant transport implications, the applicant's ES (see Section 4.3) should include a transport appraisal. The DfT's Transport Analysis Guidance (TAG)267 and Welsh Governments WelTAG268 provides guidance on modelling and assessing the impacts of transport schemes.	A Transport Assessment (document reference 7.11) has been produced for the Project. The Transport Assessment has been developed in line with DLUHC guidance (Travel Plans, Transport Assessments and Statements) and relevant TAG (formerly WebTAG) principles. The Traffic and Transport assessment reported in ES Chapter 16: Traffic and Transport (document reference 6.16) is developed using a methodology based on both DMRB and GEART guidance. Both National Highways and the relevant highway authorities have been

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		consulted on the scope of the Transport Assessment (see Appendix 16.1: Engagement Undertaken Relevant to Traffic and Transport of the ES Chapter 16: Traffic and Transport (document reference 6.16.A1) and the ES traffic and transport assessment, and their comments have informed both assessments.
5.14.6	National Highways and Highways Authorities are statutory consultees on NSIP applications including energy infrastructure where it is expected to affect the strategic road network and / or have an impact on the local road network. and applicants should consult with National Highways and Highways Authorities as appropriate on the assessment and mitigation to inform the application to be submitted.	National Grid has been engaging with the Local Highways Authorities and National Highways and the progress with each is reported in the respective Statement of Common Ground (SoCG). The relevant SoCGs are listed below: • National Highways SoCG (document reference 5.9.20) • Norfolk County Council SoCG (document reference 5.9.1) • Suffolk County Council SoCG (document reference 5.9.2) • Essex County Council SoCG (document reference 5.9.3) • Thurrock Council SoCG (document reference 5.9.4)
5.14.7	The applicant should prepare a travel plan including demand management and monitoring measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by active, public and shared transport to: • reduce the need for parking associated with the proposal; • contribute to decarbonisation of the transport network; and • improve user travel options by offering genuine modal choice.	Appendix B Outline Construction Worker Travel Plan of the Outline CTMP (document reference 7.3.B) contains the, setting out the good practice measures that will be in place to encourage sustainable transportation for the workforce, in a way that reduces both environmental and social impacts on the local area. The objective of the Outline Construction Worker Travel Plan is to encourage a reduction in the quantity of single-occupancy car journeys and to create a shift towards more sustainable modes of transport.
5.14.8	The assessment should also consider any possible disruption to services and infrastructure (such as road, rail and airports).	Operational effects to the transport network were scoped out of the assessment. The Transport Assessment (document reference 7.11) assesses the potential for disruption to infrastructure during construction.

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		A long term road closure of Wymondham Road (Link PAR 5) is required and a 2.4 km diversion route between via Flordon Road and B1113 Norwich Road. This diversion route has been agreed with the Local Highway Authority who advised this would have no significant effects on the local highway network or road users given an increase of journey time of just two minutes is anticipated for drivers and no dedicated facilities for WCH are provided. Short term temporary road closures associated with the open-cut cable swathe are also expected on some roads. However, these closures are likely to be for no more than four weeks and will be either managed or a road closure with a diversion provided. Therefore, no significant impact on WCH delay is expected.
	Mitigation	
5.14.11	Where mitigation is needed, possible demand management measures must be considered. This could include identifying opportunities to: • reduce the need to travel by consolidating trips, • locate development in areas already accessible by active travel and public transport, • provide opportunities for shared mobility, • re-mode by shifting travel to a sustainable mode that is more beneficial to the network, • retime travel outside of the known peak times, • reroute to use parts of the network that are less busy.	The Project will not generate any significant additional traffic during operation, therefore demand management has only been considered in relation to the short term, temporary construction effects. As with all major infrastructure Projects, construction of the Project will require the use of additional vehicles, although these will be low in any given month and will also be spread across the extent of the Order Limits, to limit the effect in any geographical area. The Outline CTMP (document reference 7.3) sets out the proposed good practice measures to reduce demand during construction. Measures include the use of crew vans, promoting sustainable travel routes and workers travelling outside of peak hours.
5.14.12	If feasible and operationally reasonable, such mitigation should be required, before considering requirements for the provision of new inland transport infrastructure to	Embedded measures are those that are intrinsic to and built into the design of the Project, which are presented in Table 4.2

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	deal with remaining transport impacts. All stages of the project should support and encourage a modal shift of freight from road to more environmentally sustainable alternatives, such as rail, cargo bike, maritime and inland waterways, as well as making appropriate provision for and infrastructure needed to support the use of alternative fuels including charging for electric vehicles.	in Chapter 4: Project Description (document reference 6.4). Embedded measures relevant to Traffic and Transport include: • The inclusion of a largely continuous haul road to reduce effects on the local highway network during construction, that which would be discontinued discontinuous at major obstructions along the corridor (major roads, railways, areas of environmental or historical significance and/or major watercourses). • Construction vehicles would use the haul road to move along the site, reducing construction traffic on the local road network and confining traffic to the primary access routes and designated crossing locations.
5.14.13	Regard should always be given to the needs of freight at all stages in the construction and operation of the development including the need to provide appropriate facilities for HGV drivers as appropriate.	The Project will not generate any significant additional traffic during operation. The site compounds will provide appropriate facilities for HGV drivers arriving at the site.
5.14.14	The Secretary of State may attach requirements to a consent where there is likely to be substantial HGV traffic that: • control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements • make sufficient provision for HGV parking, and associated high quality drive facilities either on the site or at dedicated facilities elsewhere, to support driver welfare, avoid 'overspill' parking on public roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions	The Outline CTMP (document reference 7.3) sets out the proposed measures for monitoring and managing the numbers, routings and timings of heavy goods vehicles (HGV) deliveries to reduce impacts on the local road network. The CTMP (document reference 7.3) will be secured by Requirement 4 of Schedule 3 in the draft DCO (document reference 3.1).

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	• ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force.	
5.14.16	Applicants should consider the DfT policy guidance "Water Preferred Policy Guidelines for the movement of abnormal indivisible loads" when preparing their application.	Given the number of construction sites proposed and the rural location of the Project away from any notable waterways and rail stations, it is not possible to rely on waterborne or rail transport for construction of the Project. The Transport Assessment (document reference 7.11) provides further details on this.
	Secretary of State decision making	
5.14.18	A new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure and the Secretary of State should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development and by enhancing active, public and shared transport provision and accessibility.	The Project will not generate any significant additional traffic during operation. Construction related traffic and transport impacts have been avoided and reduced through the design of the Project, proposed access locations and through introduction of good practice measures such as those in the Outline CTMP (document reference 7.3).
5.14.19	Where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the Secretary of State should consider requirements to mitigate adverse impacts on transport networks arising from the development, as set out below.	
5.14.20	Development consent should not be withheld provided that the applicant is willing to enter into planning obligations for funding new infrastructure or requirements can be imposed to mitigate transport impacts. In this situation the Secretary of State should apply appropriately limited weight to residual effects on the surrounding transport infrastructure.	

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5.14.21	The Secretary of State should only consider refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision.	
5.15	**Resource and Waste Management**	
	Applicant assessment	
5.15.8 – 5.15.9	The applicant should set out the arrangements that are proposed for managing any waste produced and prepare a report that sets out the sustainable management of waste and use of resources throughout any relevant demolition, excavation and construction activities. The arrangements described and a report setting out the sustainable management of waste and use of resources should include information on how re-use and recycling will be maximised in addition to the proposed waste recovery and disposal system for all waste generated by the development. They should also include an assessment of the impact of the waste arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation.	Appendix B: Outline Site Waste Management Plan of the Outline CoCP (document reference 7.2) sets out the process for managing waste on the Project. It also presents a high-level assessment of the waste capacity in the region. It also sets out how the Project intends to implement the waste hierarchy and to reduce waste being sent to landfill.
5.15.10	The applicant is encouraged to refer to the Waste Prevention Programme for England: Maximising Resources Minimising Waste and 'Towards Zero Waste: Our Waste Strategy for Wales' and should seek to minimise the volume of waste produced and the volume	Appendix B: Outline Site Waste Management Plan (SWMP) of the Outline CoCP (document reference 7.2) sets out the process for managing waste on the Project. The purpose of the Outline SWMP is to set out how the Project will seek to reduce the consumption of primary and raw materials and to encourage the use of secondary or recycled sources. It will also set out how the Project will follow the waste hierarchy by

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	of waste sent for disposal unless it can be demonstrated that this is the best overall environmental outcome.	reducing waste produced first before considering alternatives such as reuse, recycling and repurposing. The Main Works Contractor(s) will be responsible for implementing the measures outlined within the SWMP and associated management plans.
5.15.12	The UK is committed to moving towards a more 'circular economy'. Where possible, applicants are encouraged to source materials from recycled or reused sources and use low carbon materials, sustainable sources and local suppliers. Construction best practices should be used to ensure that material is reused or recycled onsite where possible.	Appendix B: Outline Site Waste Management Plan (SWMP) of the Outline CoCP (document reference 7.2) sets out the process for managing waste on the Project. The purpose of the Outline SWMP is to set out how the Project will seek to reduce the consumption of primary and raw materials and to encourage the use of secondary or recycled sources. It will also set out how the Project will follow the waste hierarchy by reducing waste produced first before considering alternatives such as reuse, recycling and repurposing. The Main Works Contractor(s) will be responsible for implementing the measures outlined within the SWMP and associated management plans.
5.15.13	Applicants are also encouraged to use construction best practices in relation to storing materials in an adequate and protected place on site to prevent waste, for example, from damage or vandalism. The use of Building Information Management tools (or similar) to record the materials used in construction can help to reduce waste in future decommissioning of facilities, by identifying materials that can be recycled or reused.	Appendix B: Outline Site Waste Management Plan (SWMP) of the Outline CoCP (document reference 7.2) sets out the process for managing waste on the Project. Section 4.2 of the Outline SWMP sets out the specific measures for efficient material use during construction. As set out in Appendix C: Outline Soil Resource Plan of the Outline CoCP (document reference 7.2) measures will include but not be limited to the following: • Details of the soil resources present • How topsoil and subsoil will be stripped and stockpiled based on their specific characteristics • Suitable conditions for when handling soil will be undertaken and climatic STOP conditions • Indicative soil storage locations

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		• How soil stockpiles will be designed taking into consideration site conditions and the nature/composition of the soil • Specific measures for managing sensitive soils • Suitable protective surfacing where soil stripping can be avoided, based on sensitivity of the environment and proposed works • Approach to reinstating soil that has been compacted, where required • Details of measures required for soil restoration.
	Secretary of State decision making	
5.15.14 – 5.15.15	The Secretary of State should consider the extent to which the applicant has proposed an effective system for managing hazardous and non-hazardous waste arising from the construction, operation and decommissioning of the proposed development. The Secretary of State should be satisfied that: • any such waste will be properly managed, both on-site and off-site. • the waste from the proposed facility can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arisings should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arisings in the area • adequate steps have been taken to minimise the volume of waste arisings, and of the volume of waste arisings sent for recovery or disposal, except where that is the best overall environmental outcome.	Appendix B: Outline Site Waste Management Plan (SWMP) of the Outline CoCP (document reference 7.2) sets out the process for managing waste, during construction, both on site and off site including potentially hazardous waste on the Project. The Outline Site Waste Management Plan sets out, in an auditable manner, how waste will be reduced, reused, managed, and disposed of in accordance with the waste hierarchy. Dedicated areas have been identified on the construction plans to allow materials and wastes to be segregated at source, reducing the risk of damage or contamination. The Outline SWMP has undertaken a review of local waste disposal sites has been completed in line with the requirements of the Overarching National Policy Statement for Energy (EN-1) (Department for Energy Security and Net Zero, 2024). The Project will not generate large quantities of waste for landfill, due to the nature of the waste anticipated (large proportions of which can be reused or recycled) and also due to the targets set by National Grid with regards to waste management. Essex County Council is forecasting to be at

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		capacity over the plan period, however there is landfill capacity within Suffolk, within which the majority of the Project lies. Therefore, the levels of waste estimated to be produced by the Project will not exceed the waste capacity available in the region. With regards to operational waste the Main Works Contractor(s) will prepare a final SWMP which will be maintained and monitored throughout the construction.
5.15.16	Where necessary, the Secretary of State should use requirements or obligations to ensure that appropriate measures for waste management are applied.	Appendix B: Outline Site Waste Management Plan (SWMP) of the Outline CoCP (document reference 7.2) sets out the process for managing waste on the Project. The Outline CoCP (document reference 7.2) will be secured as secured by Requirement 4 of Schedule 3 of the draft DCO (document reference 3.1).
5.15.17	The Secretary of State may wish to include a condition on revision of waste management plans at reasonable intervals when giving consent.	Appendix B: Outline Site Waste Management Plan (SWMP) of the Outline CoCP (document reference 7.2) sets out the process for managing waste on the Project. The Main Works Contractor(s) will be responsible for implementing the measures outlined within the SWMP and associated management plans.
5.15.18	Where the project will be subject to the Environmental Permitting regime, waste management arrangements during operations will be covered by the permit and the considerations set out in Section 4.12 will apply.	Appendix B: Outline Site Waste Management Plan (SWMP) of the Outline CoCP (document reference 7.2) sets out the process for managing waste on the Project. The Project will be run in compliance with all relevant legislation, consents and permits in accordance with good practice measure GG01 of the Outline CoCP (document reference 7.2). Where required, permits from relevant planning authorities and/or the Environment Agency, will be sought prior to commencement of the relevant works. Consultation will be undertaken by the Main Works Contractor(s) with the appropriate bodies.

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5.15.19	The Secretary of State should have regard to any potential impacts on the achievement of resource efficiency and waste reduction targets set under the Environment Act 2021 or wider goals set out in the government's Environmental Improvement Plan 2023.	Appendix B: Outline Site Waste Management Plan (SWMP) of the Outline CoCP (document reference 7.2) sets out the process for managing waste on the Project. Section 2.5 of the SWMP sets out the targets for material management and waste reduction.
5.16	**Water Quality and Resources**	
	Applicant assessment	
5.16.3	Where the project is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment, and how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment, as part of the ES or equivalent (see Section 4.3 and 4.10).	ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) details the likely significant effects of the Project on the water environment with respect to surface water. The baseline of the water environment is characterised in this chapter. The assessment has been informed by a Water Framework Directive (WFD) Assessment (document reference 7.10).
5.16.4	The applicant should make early contact with the relevant regulators, including the local authority, the Environment Agency and Marine Management Organisation, where appropriate, for relevant licensing and environmental permitting requirements.	National Grid has continued to engage with the Environment Agency throughout the design and evolution of the Project, through various consultation exercises and through thematic meetings. All engagement is recorded in the Draft Statement of Common Ground Environment Agency (document reference 5.9.16). In addition, National Grid has continued to engage with the Local Authorities and specifically in this regard in their capacity as the Lead Local Flood Authority (LLFA). Discussions have informed the development of the FRA, amongst other matters. National Grid also circulated a draft version of the FRA to the Environment Agency and LLFA ahead of the submission of the application for development consent for their consideration and comment. Subsequently, the consultees' feedback was taken into consideration whilst preparing the FRA submitted with the application for development consent. Details on the consultation undertaken

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		can be found in Section 1.3 of the FRA (document reference 7.9). Details on how consultation responses have informed the assessment can be found in the Consultation Report (document reference 5.1). A series of water environment thematic meetings have been held with the Environment Agency, local authorities and the Local Lead Flood Authorities and the Water Management Alliance Internal Drainage Boards. Further information on these thematic meetings is set out in Table 12.1 of ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12). National Grid made early contact with relevant regulators including the Marine Management Organisation MMO. The Consultation Report (document reference 5.1) details the MMOs comments which concluded that the development is an inland development so would not require a marine licence, therefore National Grid have not consulted further with the MMO.
5.16.5	Where possible, applicants are encouraged to manage surface water during construction by treating surface water runoff from exposed topsoil prior to discharging and to limit the discharge of suspended solids e.g. from car parks or other areas of hard standing, during operation.	Table 6.1 of the Outline CoCP (document reference 7.2) sets out the measures that will be implemented to safeguard surface water and groundwater water quality and manage land drainage and flood risk during construction of the Project. The Plan will demonstrate how runoff across the site will be controlled to prevent any off-site increases in flood risk. In accordance with good practice measure W13, the layout of the site compounds will be planned to control potential risks to surface water, groundwater and flooding. The main site compound is assumed to be connected to mains water supply, subject to approvals from the relevant utility provider. Wastewater will undergo suitable treatment measures such as biodigesters or would be taken away by tankers to a suitable disposal unit. No surface water discharges to watercourses or existing drainage systems have been identified to date. However, in

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		accordance with good practice measure GG01, the Project will be delivered and operated in compliance with all relevant legislation, consents and permits, therefore any consents would be sought where appropriate. There is a low risk of the Project generating significant effects on surface water receptors. Commitment GG27 of the Outline CoCP states that the appointed Main Works Contractor(s) will prepare a Construction Surface Water Management Plan (CSWMP) to inform discharge of the DCO Requirement.
5.16.6	Applicants are encouraged to consider protective measures to control the risk of pollution to groundwater beyond those outlined in River Basin Management Plans and Groundwater Protection Zones – this could include, for example, the use of protective barriers.	Measures to control the risk of pollution to groundwater are included in Table 6.1 of the Outline CoCP (document reference 7.2) and ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12).
5.16.7	The ES should in particular describe: • the existing quality of waters affected by the proposed project and the impacts of the proposed project on water quality, noting any relevant existing discharges, proposed new discharges and proposed changes to discharges • existing water resources281 affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to Abstraction Licensing Strategies) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance	ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) details the existing baseline (including quality and existing physical characteristics) and the likely significant effects of the Project on the water environment with respect to surface water, and the existing baseline and the likely significant effects on groundwater receptors (including SPZ and abstractions). The assessment has been informed by a WFD Assessment (document reference 7.10). Section 12.5 of ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) includes a description of future baseline conditions which takes the likely impacts of climate change into account. The FRA (document reference 7.9) also addresses climate change. Cumulative effects are addressed in ES Chapter 17: Cumulative Effects (document reference 6.17).

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	• existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project and any impact of physical modifications to these characteristics • any impacts of the proposed project on water bodies or protected areas (including shellfish protected areas) under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and source protection zones (SPZs) around potable groundwater abstractions • how climate change could impact any of the above in the future • any cumulative effects	
	Mitigation	
5.16.8	The Secretary of State should consider whether mitigation measures are needed over and above any which may form part of the project application. A construction management plan may help codify mitigation at that stage.	The assessment presented in ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) has concluded that with mitigation measures (set out in the Outline CoCP (document reference 7.2)) in place there are no likely long term significant residual effects in relation to water environment receptors during the construction of the Project. Effects on watercourses, their water quality and hydromorphology, and effects on existing surface water interests (abstractions and discharges) are scoped out for operation (and maintenance) in accordance with the EIA Scoping Opinion (document reference 6.20). Discussions would be held with the Environment Agency in relation to any required consents and permits necessary of the works, in accordance with commitment W01 in the Outline CoCP (document reference 7.2). The works would subsequently be carried out in accordance with the requirements of these consents, thereby safeguarding water

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		environment receptors. Water pollution from permanent drainage will be avoided by timed inspections and maintenance by the Applicant, as required to safeguard surface and groundwater quality.
5.16.9	The risk of impacts on the water environment can be reduced through careful design to facilitate adherence to good pollution control practice. For example, designated areas for storage and unloading, with appropriate drainage facilities, should be clearly marked.	Embedded measures relevant to hydrology, land drainage and flood risk are summarised in Section 12.6 of ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) and good practice measures are set out in the Outline CoCP (document reference 7.2).
5.16.10	The impact on local water resources can be minimised through planning and design for the efficient use of water, including water recycling. If a development needs new water infrastructure, significant supplies or impacts other water supplies, the applicant should consult with the local water company and the EA or NRW.	No new consumptive surface water abstractions are anticipated to facilitate the Project during construction. The assessment presented within ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) assumes that there may be the need for temporary 'short-term dewatering' of open cut trenches to remove rainwater and minor groundwater seepages would be made to the ground. Further details are provided in ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12).
	Secretary of State decision making	
5.16.11	Activities that discharge to the water environment are subject to pollution control. The considerations set out in Section 4.12 on the interface between planning and pollution control therefore apply. These considerations will also apply in an analogous way to the abstraction licensing regime regulating activities that take water from the water environment, and to the control regimes relating to works to, and structures in, on, or under controlled waters.	In accordance with commitment GH11 in the Outline CoCP (document reference 7.2), 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 of drilling fluids, where appropriate. 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 approval prior to construction.

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		Commitment GG38 in the Outline CoCP (document reference 7.2), sets out that there will be no intentional discharge of site runoff to ditches, watercourses, drains, including highways drainage systems, or sewers without appropriate treatment and agreement of the appropriate authority
5.16.12	The Secretary of State will need to give impacts on the water environment more weight where a project would have an adverse effect on the achievement of the environmental objectives established under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.	A WFD Assessment (document reference 7.10) has been produced as part of the application for development consent. The WFD Assessment concludes that the Project is compliant with the objectives of the WFD and would not have an adverse effect on the achievement of the environmental objectives.
5.16.14	The Secretary of State should be satisfied that a proposal has regard to current River Basin Management Plans and meets the requirements of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (including regulation 19). The specific objectives for particular river basins are set out in River Basin Management Plans. The Secretary of State must refuse development consent where a project is likely to cause deterioration of a water body or its failure to achieve good status or good potential, unless the requirements set out in Regulation 19 are met. A project may be approved in the absence of a qualifying Overriding Public Interest test only if there is sufficient certainty that it will not cause deterioration or compromise the achievement of good status or good potential.	A WFD Assessment (document reference 7.10) has been produced as part of the application for development consent. The WFD Assessment includes information on the relevant River Basin Management Plans and concludes that the Project is compliant with the objectives of the WFD and would not have an adverse effect on the achievement of the environmental objectives.
5.16.15	The Secretary of State should also consider the interactions of the proposed project with other plans such as Water Resources Management Plans and Shoreline Management Plans.	The Project does not interact with the coastline and has a very low consumptive water demand (linked to the construction phase only), therefore has no interactions with those other Plans.

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5.16.16	The Secretary of State should consider proposals to mitigate adverse effects on the water environment and any enhancement measures put forward by the applicant and whether appropriate requirements should be attached to any development consent and/or planning obligations are necessary.	The assessment presented in ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) has concluded that there are no likely significant residual effects in relation to water environment receptors during the construction or operation of the Project. The good practice measures for reducing effects on the water environment are set out in the Outline CoCP (document reference 7.2).

Signposting for Compliance with EN-5 (Designated January 2024)

Table 1.2 Signposting for Compliance with EN-5

Paragraph No.	Policy Requirement	How the Project Meets the Policy
1.6	**Infrastructure covered by this NPS**	
1.6.2	This NPS covers above ground electricity lines: i. whose nominal voltage is expected to be 132kV or above (other than a 132kV line associated with the construction or extension of a devolved Welsh generating station); ii. whose length is greater than 2km; iii. that are not a replacement line falling within Section 16(3)(ab) of the 2008Act; and iv. that are not otherwise exempted for reasons set out in Sections 16(3)(b) and (c), (3A) and (3B) of the 2008 Act	Policies 1.6.2 and 1.6.4 confirm that NPS EN-5 applies to the Project.
1.6.4	In addition, this NPS will apply to other kinds of electricity networks infrastructure including offshore transmission of any type (defined at section 2.12.4), underground cables at any voltage, associated infrastructure as referred to above and lower voltage overhead lines, where that infrastructure becomes subject to the 2008 Act in the following circumstances: i. if it constitutes associated development for which consent is sought along with an NSIP such as an offshore wind generating station or relevant overhead line; or ii. if the Secretary of State gives a direction under Section 35 of the 2008 Act (for developments which, when completed, will be wholly in one or more of the areas specified in subsection 35(3)) that it should be	

Paragraph No.	Policy Requirement	How the Project Meets the Policy
	treated as an NSIP and requires a development consent order (DCO).	
Chapter 2: Assessment and Technology Specific Information		
2.1	**Introduction**	
2.1.5	As stated in Section 4.2 of EN-1, to support the urgent need for new low carbon infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations, are considered to be CNP infrastructure. This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System.	NPS EN-1 classifies transmission Projects, such as Norwich to Tilbury, as Critical National Priority (CNP) infrastructure. This further reinforces the urgent need for the Project.
2.1.6	The assessment principles outlined in Section 4 of EN-1 continue to apply to CNP infrastructure. Applicants must show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. Early application of the mitigation hierarchy is strongly encouraged, as is engagement with key stakeholders including SNCBs, both before and at the formal pre-application stage.	The need for the Project is summarised in Chapter 3 of the Planning Statement (document reference 5.6) and the Strategic Options Backcheck and Review Report (document reference 7.17). New connections for new offshore wind and nuclear power generation Projects and for interconnectors into East Anglia are expected to continue in addition to the current contracted position. These new connections are being constructed or are expected to connect into substations at Necton, Norwich Main, Bramford, Friston and Sizewell. Additionally, agreements are in place with two offshore wind farm Projects and an interconnector based on their connections into a new EACN Substation. National Grid has a duty to facilitate new connections and maintain a safe National Electricity Transmission System (NETS) and has considered the capability of the existing network to support such connections. In accordance with national policy requirements, the Project has been designed following the mitigation hierarchy. At the

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		routeing and siting stage, the Project design process was informed by the Holford and Horlock Rules to avoid impacts where possible. These established guidelines informed the evaluation criteria and how the mitigation hierarchy was applied during the options selection process. The adopted design approach is set out within ES Chapter 3: Alternatives (document reference 6.3) which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the application for development consent. Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features as far as reasonably practicable. The Project has considered sensitive areas and design minimisation of impacts. The mitigation hierarchy is a key component of the Environmental Impact Assessment Process. ES Chapter 5: EIA Approach and Method (document reference 6.5) describes the mitigation hierarchy as a stepped process that helps development projects to address potentially adverse impacts on the environment. The Consultation Report (document reference 5.1) provides a complete overview of the consultation and stakeholder engagement activities on the Project and explains how National Grid has had regard to the statutory guidance about the pre-application procedure pursuant to Section 50 of the Planning Act 2008. National Grid has undertaken a number of environmental and thematic meetings with environmental organisations to gather information about the baseline environment, scope of the assessment and potential effects and mitigation. The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the

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		careful consideration of route corridors and the application of design principles. National Grid has prepared draft Statements of Common Ground with the SNCBs capturing details of matters agreed through this engagement.
2.2	**Factors influencing site selection and design**	
2.2.1	The Secretary of State should bear in mind that the initiating and terminating points – or development zone – of new electricity networks infrastructure is not substantially within the control of the applicant.	The need for the Project is summarised in Chapter 3 of the Planning Statement (document reference 5.6) and the Strategic Options Backcheck and Review Report (document reference 7.17). New connections for new offshore wind and nuclear power generation Projects and for interconnectors into East Anglia are expected to continue, in addition to the current contracted position. These new connections are being constructed or are expected to connect into substations at Necton, Norwich Main, Bramford, Friston and Sizewell. Additionally, agreements are in place with two offshore wind farm Projects and an interconnector based on their connections into a new EACN Substation. National Grid has a duty to facilitate new connections and maintain a safe National Electricity Transmission System (NETS) and has considered the capability of the existing network to support such connections.
2.2.2	Siting is determined by: • the location of new generating stations or other infrastructure requiring connection to the network, and/or • system capacity and resilience requirements determined by the Electricity System Operator.	The need for the Project is summarised in Chapter 3 of the Planning Statement (document reference 5.6) and the Strategic Options Backcheck and Review Report (document reference 7.17). New connections for new offshore wind and nuclear power generation Projects and for interconnectors into East Anglia are expected to continue in addition to the current contracted position. East Anglia's 400 kV electricity transmission network was built in the 1960s. It was built to supply regional demand, centred around Norwich and Ipswich. With the growth in new energy generation from offshore wind, nuclear power and

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		interconnection with other countries, there will be more electricity connected in East Anglia than the network can currently accommodate. As a result, and to comply with its duties, National Grid needs to reinforce the electricity network to allow power to be imported to and exported from East Anglia. The reinforcement would provide additional capability to connect to areas of demand, allowing power flows across boundaries, and linking interconnectors to and from Europe. The National Grid Electricity System Operator (ESO) concluded that the existing high voltage electricity network in East Anglia does not have the capacity needed to reliably and securely transport all the energy that will be connected into the network while meeting the National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS). The Design Development Report (document reference 5.15), Design and Access Statement (document reference 7.15) and Design Approach for Site Specific Infrastructure (document reference 7.16) and Design and Access Statement and Planning Statement (document reference 5.6) should be read alongside both ES Chapter 3: Alternatives (document reference 6.3), which documents the key environmental factors in consideration of the alternatives, and explain explains how planning policy, as well as the requirements of the Electricity Act and the principles of the Holford and Horlock Rules, have influenced the optioneering and design evolution process.
2.2.3	These twin constraints, coupled with the government's legislative commitment to net zero by 2050, strategic commitment to new interconnectors with neighbouring North Seas countries7 and an ambition of up to 50GW of offshore wind generation by 2030, means that very significant amounts of new electricity networks	Offshore wind energy has an important role to play in delivering this strategy, and a significant step change is required to deliver up to 50 GW of offshore wind energy by 2030, given the current capacity is around 13 GW. Energy networks will be a critical enabler for the clean energy transition; however, the scale and pace of investment needed

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	infrastructure is required, including in areas with comparatively little build-out to date.	to meet the UK's decarbonisation targets are significant. National Grid sits at the heart of Britain's energy system, connecting millions of people and businesses to the energy they use every day. Overall, National Grid will be investing around £15bn in the UK over 5 years to upgrade our networks and support the UK's net zero ambition. The Great Grid Upgrade is the largest overhaul of the electricity grid in generations. National Grid's infrastructure Projects across England and Wales are helping to connect more renewable energy to homes and businesses. The growth in offshore wind, nuclear generation, and interconnector capacities in East Anglia greatly increase the power transfer requirements out of the region as local total generation will exceed local demand. The existing high voltage electricity network in East Anglia does not have the capability needed to reliably and securely transport all the energy that will be connected while meeting the Security and Quality of Supply Standard (SQSS). Several network reinforcements Projects are planned to address the shortfall of which the Project is one. The need for the Project is summarised in Chapter 3 of the Chapter 3 of the Planning Statement (document reference 5.6) and the Strategic Options Backcheck and Review Report (document reference 7.17). Increased transmission capability is required in the East Anglia region, to allow National Grid 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.
2.2.5	Additionally, applicants retain control in managing the identification of routing and site selection between the identified initiating and terminating points or within the development zone.	ES Chapter 3: Alternatives (document reference 6.3) sets out the alternatives which were considered as part of the Project development. The Chapter summarises a number series of earlier studies which considered alternative route corridors,

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		substation siting and technology options. It presents the alternatives that were studied as part of the development of the Project, focusing on strategic and significant alternatives. ES Chapter 3 should be read in conjunction with the following reports: • Corridor and Preliminary Routing and Siting Study (CPRSS) (National Grid, 2022) • Strategic Options Backcheck and Review (SOBR) (National Grid, 2023) • Design Development Report (National Grid, 2023) • Design Development Report (National Grid, 2024) • Strategic Options Backcheck and Review (SOBR) (document reference 7.17) • Design Development Report (document reference 5.15)
2.2.6	Moreover, the locational constraints identified above do not, of course, exempt applicants from their duty to consider and balance the site-selection considerations set out below, much less the policies on good design and impact mitigation detailed in sections 2.4-2.9.	National Grid will develop a well-designed Project which responds positively to policy drivers, environmental constraints and comments from stakeholders and the public, providing mitigation where necessary in order to overcome adverse impacts which can be associated with overhead lines.
2.2.7	The connection between the initiating and terminating points of a proposed new electricity line will often not be via the most direct route. Siting constraints, such as engineering, environmental or community considerations will be important in determining a feasible route.	The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. Embedded mitigation measures have been integral in reducing, and where possible, avoiding, the landscape and visual effects of the Project. The Design Development Report (document reference 5.15), Design and Access Statement (document reference 7.15) and Design Approach for Site Specific Infrastructure (document reference 7.16) presents the different choices made during the design process. These documents should be read alongside both ES Chapter 3: Alternatives (document reference 6.3),

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		which documents the key environmental factors in consideration of the main alternatives, and Planning Statement (document reference 5.6), which explains how planning policy, as well as the requirements of the Electricity Act and the principles of the Holford and Horlock Rules, have influenced the optioneering and design evolution process. The latter demonstrating how such policy and legislative objectives have been embedded into the design of the Project.
2.2.8 and 2.2.9	There will usually be a degree of flexibility in the location of the development's associated substations, and applicants should consider carefully their location, as well as their design. In particular, the applicant should consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other options to mitigate any impacts. (See Section 2.10 below and Section 5.10 in EN-1.)	The Horlock Rules provide guidelines for the siting and design of new substations, or substation extensions and these rules have been an important consideration in the design and siting of the EACN and Tilbury North substations which is associated development to the NSIP. The Horlock Rules require National Grid to consider local topography and the possibilities for screening. The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of the siting of substations and CSE compounds through the application of design principles. The Design Development Report (document reference 5.15) and Design Approach for Site Specific Infrastructure (document reference 7.16) present the different choices made during the design process.
2.2.10	As well as having duties under Section 9 of the Electricity Act 1989, (in relation to developing and maintaining an economical and efficient network), applicants must take into account Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to "have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest	As a licence holder National Grid has specific duties to uphold in relation to the desirability of preserving amenity of certain aspects of the environment and to mitigate the effects of its activities on the environment under Section 38 and Schedule 9 of the Electricity Act 1989. National Grid's Schedule 9 Statement (2016) sets out how the company would meet the duty placed upon it by the aforementioned legislation. As set out in ES Chapter 8: Ecology and Biodiversity (document reference 6.8) the Project has been designed, as far as practicable following the mitigation hierarchy in order to,

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	and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and …do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects."9	in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. The landscape and visual impacts of the Project are assessed in ES Chapter 13: Landscape and Visual (document reference 6.13). Throughout the design process measures have been taken to reduce the landscape and visual effects of the Project as far as practicable. ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the assessment of the likely significant historic environment effects that could result from the Project. The ES chapter concludes that the Project would not result in substantial harm to any heritage assets and assesses the assets that will be subject to less than substantial harm.
2.2.11	Depending on the location of the proposed development, statutory duties under Section 85 of the Countryside and Rights of Way Act 2000, Section 11A of the National Parks and Access to the Countryside Act 1949 (as amended by Section 62 of the Environment Act 1995), and Section 17A of the Norfolk and Suffolk Broads Act 1988 may be relevant. Applicants should note amendments to each of these provisions contained in Section 245 of the Levelling Up and Regeneration Act 2023.	The relevant section, Section 245 (Protected landscapes), of the Levelling-Up and Regeneration Act 2023 states (and where relevant to the Project), '*(A1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.* *(A2) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a devolved Welsh authority must have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty*.' The clause expands the duty on certain public authorities, including Statutory Undertakers (including National Grid), when carrying out functions in relation to these landscapes to seek to

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		further the statutory purpose and confers a power to make provision as to how they should do this. The legislation has been expanded from 'having regard' to 'furthering the purpose' of protected landscapes such as National Landscapes. In any event, National Grid considers the Project is compliant with the new 2023 Act obligation as set out above, as the Project proposes to underground the proposed 400 kV overhead line within the National Landscape and beyond its boundary. The potential measures and approach to the protected landscape duty being taken by National Grid has been discussed with stakeholders to seek their feedback. Engagement is being undertaken with the Dedham Vale National Landscape Partnership and relevant local authorities. This engagement is ongoing. The measures to evidence the 'seek to further' duty under s245 of the Levelling-Up and Regeneration Act 2023 are still being developed and discussed with the stakeholders. These measures will continue to be developed taking account of feedback, in consideration of the Project effects, special qualities and the Dedham Vale AONB and Stour Valley Project Area Management Plan 2021-2026. This is reported in the National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) document reference 5.10). A further update will be provided in addition to details regarding how the measures to seek to evidence the duty will be secured in due course.
2.2.12	Transmission and distribution licence holders are also required under Schedule 9 to the Electricity Act 1989 to	National Grid's Schedule 9 Statement (2016) sets out how the company would meet the duty placed upon it by the aforementioned legislation.

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	produce and publish a statement setting out how they propose to perform this duty generally.	
2.3	**Climate change adaptation and resilience**	
2.3.1 to 2.3.2	Section 4.10 of EN-1 sets out the generic considerations that applicants and the Secretary of State should take into account in order to ensure that electricity networks infrastructure is resilient to the effects of climate change. As climate change is likely to increase risks to the resilience of some of this infrastructure, from flooding for example, or in situations where it is located near the coast or an estuary or is underground, applicants should in particular set out to what extent the proposed development is expected to be vulnerable, and, as appropriate, how it has been designed to be resilient to: • flooding, particularly for substations that are vital to the network; and especially in light of changes to groundwater levels resulting from climate change; • the effects of wind and storms on overhead lines; • higher average temperatures leading to increased transmission losses; • earth movement or subsidence caused by flooding or drought (for underground cables); and • coastal erosion – for the landfall of offshore transmission cables and their associated substations in the inshore and coastal locations respectively.	The effects of climate change on flood risk over the lifetime of the Project are assessed in the FRA (document reference 7.9), which also details the embedded and good practice measures to make the Project resilient to climate change. National Grid has incorporated climate change adaptation and resilience throughout the Project's design and lifetime. Above-ground elements, including substations, CSE compounds, and construction compounds, have been located in Flood Zone 1 to avoid areas of significant flood risk, as described in the FRA and ES Chapter 3: Alternatives (document reference 6.3). Other structures, such as pylons and underground cables, are designed to National Grid's technical standards to withstand flooding, wind, storms, extreme temperatures, and earth movement. Consequently, the Project is considered resilient to climate change over its design life.
2.3.3	Section 4.10 of EN-1 advises that the resilience of the project to the effects of climate change must be assessed in the Environmental Statement (ES) accompanying an application. For example, future increased risk of flooding would be covered in any flood risk assessment (see Sections 5.8 in EN-1).	

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	Consideration should also be given to coastal change (see sections 5.6 in EN1).	
2.4	**Consideration of good design for energy infrastructure**	
2.4.1	The Planning Act 2008 requires the Secretary of State to have regard, in designating an NPS, and in determining applications for development consent to the desirability of good design.	The Planning Statement (document reference 5.6), the Design and Access Statement (document reference 7.15) and Design Approach for Site Specific Infrastructure (document reference 7.16) explains how the Project complies with the criteria for good design set out in EN-1 and summarises the Project's design and site selection process. This is also covered within the following is documented in detail in the following reports: • ES Chapter 3: Alternatives (documents reference 6.3) • Strategic Options Backcheck and Review Report (document reference 7.17) • Design Development Report (document reference 5.15) • Design and Access Statement (document reference 7.15) • Design Approach to Site Specific Infrastructure (document reference 7.16) The above documents provide details of how the design process was conducted and how the design has evolved. They demonstrate how the Project has undergone an iterative design process led by the early consideration of environmental and planning constraints to avoid and minimise impacts.
2.4.2	Applicants should consider the criteria for good design set out in EN-1 Section 4.7 at an early stage when developing projects	
2.4.3	However, the Secretary of State should bear in mind that electricity networks infrastructure must in the first instance be safe and secure, and that the functional design constraints of safety and security may limit an applicant's ability to influence the aesthetic appearance of that infrastructure.	This is noted and the design considerations have taken place within the context of meeting National Grid's duty to be economical and efficient and also within the rigorous health and safety processes that National Grid has in place than govern how it designs and constructs its Projects safely. National Grid is already required to ensure that the Project is designed in accordance with standards set out within or overseen by, amongst others, the Electricity Supply, Quality and Continuity Regulations, British Standards (BS), European

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		Standards, the 'Conseil International des Grands Réseaux Electriques', the International Electrotechnical Commission, and the Electricity Networks Association. In addition, the Project must accord with each of the following: National Grid Design Standards, National Grid Technical Specification, National Grid Transmission Procedures, National Grid Policy Statement (Transmission), National Grid Technical Guidance Notes (Electricity) and National Grid Technical Reports (Electricity). National Grid has considered the proposed materials and colour palette for the CSE compounds and new substation / substation extension including buildings to be sensitive to the environment they are located in, where practicable. Further information is included in the Design Approach for Site-Specific Infrastructure (document reference 7.16).
2.4.4	While the above principles should govern the design of an electricity networks infrastructure application to the fullest possible extent – including in its avoidance and/or mitigation of potential adverse impacts (particularly those detailed in Sections 2.9 below) – the functional performance of the infrastructure in respect of security of supply and public and occupational safety must not thereby be threatened.	See response to 2.4.3.
2.5	**Environmental and Biodiversity Net Gain**	
2.5.1	When planning and evaluating the proposed development's contribution to environmental and biodiversity net gain, it will be important – for both the applicant and the Secretary of State – to supplement the generic guidance set out in EN-1 (Section 4.6) with recognition that the linear nature of electricity networks infrastructure can allow for excellent opportunities to:	The Project will deliver a minimum 10% BNG – The Project would deliver a net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported separately outside of the ES. Further details can be found in the Biodiversity Net Gain Report (document reference 7.1). National Grid's approach is to provide any on-site BNG in a coordinated manner in locations that do not prejudice the siting

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	• reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or • connect people to the environment, for instance via footpaths and cycleways constructed in tandem with environmental enhancements.	or routeing of future electricity infrastructure, such as substation extensions or customer connections. This approach is in the best interests of nature and is economic and efficient because it safeguards onsite BNG and means that on-site landscape screening or other environmental mitigation can also contribute towards BNG. Discussions are currently taking place between National Grid and the Waveney and Little Ouse Recovery (WaLOR) scheme (Suffolk Wildlife Trust, 2025), a landscape recovery scheme which is located in the same geographic area as the Project. This project is seeking to deliver a number of BNG units in addition to the delivery of the WaLOR scheme and National Grid have discussed the opportunity to deliver approximately 600 area habitat units. This could comprise a mixture of woodland, other neutral grassland as well as the potential to deliver wetland mosaic habitats. The final mix of units and location will be explored as the WaLOR scheme develops. Suffolk Wildlife Trust have also identified Market Weston Fen a habitat bank in Suffolk that comprises mixed scrub and other neutral grassland. National Grid is currently in discussion with both parties to sign an Expression of Interest and updated details will be provided accordingly. Essex Wildlife Trust have issued a letter to National Grid confirming that they are happy to assist with the requirement of approximately 400 units in Essex, which include other neutral grassland, mixed scrub, individual trees and acid grassland. National Grid will continue to work with Essex Wildlife Trust to identify potential sites as the Project progresses. National Grid is continuing these discussions with the Wildlife Trusts and other third parties in regard to securing the off-site units through a legal agreement (unilateral undertaking under s.106 of the Town and Country Planning Act 1990), and progress on such discussions will be provided accordingly.

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2.6	**Land Rights and Land Interests**	
2.6.1	In order to be lawfully able to install, inspect, maintain, repair, adjust, alter, replace or remove an electricity line (above or below ground), its related equipment (such as monopoles, pylons/transmission towers, transformers and cables), and/or its associated mitigation or enhancement schemes, applicants must: • own the land on, over, or under which the relevant activity is to take place; or • hold sufficient rights over or interests in that land (typically in the form of an easement); or iii. have permission for the activity from the present owner or occupier of that land (typically in the form of a wayleave).	In the Book of Reference (document reference 4.3) each land plot is numbered uniquely so that the prefix of the plot number relates to the land plan sheet number on which the plot appears. The Land Plans (document reference 2.2) show the Order Limits and the numbered plots within the Order Limits that are listed in the sections of the Book of Reference. Each plot is coloured. The colouring serves to differentiate the type of rights or powers sought for each given plot within the Order Limits which corresponds to the respective interest, right or power to be acquired or used.
2.6.2	Where the applicant does not own or wish to own the land in question, it should try to reach a voluntary agreement giving it sufficient rights and/or permissions to undertake the relevant work.	National Grid will continue to attempt to seek all rights it needs by voluntary agreement, subject to the DCO being made. National Grid has undergone extensive consultation with all persons with an interest in the relevant land in order to try to avoid the need for compulsory acquisition. This approach to making the application for the DCO in parallel to conducting negotiations to acquire rights in land by agreement wherever practicable, is in accordance with Paragraph 25 of the Planning Act 2008: Guidance Related to Procedures for Compulsory Acquisition of Land, produced by the DCLG, as updated September 2013.
2.6.3	As a last resort, where it does not succeed in reaching the agreement that it requires, the network company may, as part of its application to the Secretary of State, seek to acquire rights compulsorily over the land in question by means of a provision in the DCO.	Justification for the use of compulsory acquisition powers is set out in the Statement of Reasons (document reference 4.1).

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2.6.4	In such cases (i.e. where the compulsory acquisition of rights is sought) permanent arrangements are strongly preferred over voluntary wayleaves (which could, for example, be terminable on notice by the landowner) in virtue of their greater reliability and economic efficiency and reflecting the importance of the relevant infrastructure to the nation's net zero goals.	It is National Grid's policy for all rights for new apparatus – underground cable or overhead line to be secured by easements as opposed to wayleaves. These are granted for a capital sum, and a legal interest is created in the affected land which is permanent and not terminable.
2.6.5	The applicant may also seek the compulsory acquisition of land. This will not normally be necessary where lines and cables are installed but may be sought where other forms of electricity networks infrastructure (such as new substations) are required.	Noted
2.6.6	As detailed in Section 4.1.8 of EN-1, where the use of land at a specific location is required to facilitate the development by providing for mitigation, landscape enhancement and biodiversity net gain, an applicant may, as part of its application to the Secretary of State, seek the compulsory acquisition of that land, or rights over that land. The Secretary of State will consider any such application under the provisions of the Planning Act 2008 and any associated guidance.	The Environmental Areas are located on land to be acquired by National Grid.
2.7	**Holistic planning**	
2.7.1	EN-1 explains in Section 4.10 that the Planning Act 2008 aims to create a holistic planning regime, such that the cumulative effects of the same Project can be considered together. Co-ordinated applications typically bring economic efficiencies and reduced environmental impact.	The document "2024 National Grid Electricity Transmission Response to the ESO East Anglia Network Study (March 2024)" provides a response of National Grid Electricity Transmission (NGET) to the ESO East Anglia Network Study (the ESO Study) published by the Electricity System Operator (ESO) in March 2024. The ESO Study responds to the UK Government's ongoing Offshore Coordinated Support Scheme (OCSS). The ESO study has concluded the following:
2.7.2	Accordingly, the government envisages that, wherever reasonably possible, applications for new generating stations and their related infrastructure should be	

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	contained in a single application to the Secretary of State. However, a consolidated approach of this kind may not always be possible, nor represent the most efficient strategy for delivery of new infrastructure.	• Economic: Option 3, which includes the Norwich to Tilbury Project with an additional Friston to EACN Substation line, is identified as the most economically optimal solution if Offshore Coordinated Connection System (OCSS) coordination between Sea Link and the two offshore wind farms progresses. • Environment and Community: Option 3 is less constrained environmentally compared to offshore HVDC options, which have higher consenting risks due to converter stations. • Deliverability: Environmental impacts of the Project can be mitigated with careful route planning and the use of appropriate technologies, adhering to National Policy Statements for nationally significant infrastructure Projects. • Next Steps: The grant funding from OCSS does not change the requirement for the EACN Substation as part of Norwich to Tilbury. NGET must continue to meet its licence obligations and progress with Norwich to Tilbury until full offshore coordination is confirmed, at which point reinforcement options will be reviewed. Norwich to Tilbury has been identified as an "HND essential" option under the Holistic Network Design (HND) strategic planning framework. It has also been classified as an Accelerated Strategic Transmission Investment (ASTI) project by Ofgem, aimed at expediting the delivery of the UK Government's 2030 energy goals.
2.7.3	This could be, for example, due to the differing lengths of time needed to prepare the applications for submission to the Secretary of State, or because a network application relates to multiple generation projects (which could be onshore or offshore), or because the works involved are strategic reinforcements required for a number of reasons.	
2.7.4	It may also be the case that the networks infrastructure application and the application for a related generating station will of necessity come from different legal entities, or from entities subject to different commercial and regulatory frameworks.	
2.7.5	It will also be common for applications to be submitted for the general purpose of reinforcing the network, which will be critical to deliver especially in light of the drive towards net zero, including the ambition for up to 50GW of offshore wind by 2030, and a CNP (see EN-3).	
2.8	**Strategic Network Planning**	
2.8.1	A more strategic approach to network planning will ensure that network development keeps pace with renewable generation and anticipates future system needs. Strategic network planning, such as through the Holistic Network Design and its follow up exercises or through forthcoming Centralised Strategic Network	The Norwich to Tilbury Project is not being submitted as part of larger, single application which incorporates the renewable energy Projects which will connect into the electricity transmission network. In December 2023, the UK government funded a consortium—including National Grid's Sea Link Project, North Falls, and Five Estuaries offshore wind farms—

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	plans, helps reduce the overall impact of infrastructure by identifying opportunities for coordination, where appropriate, and taking a holistic view of both the onshore and offshore network. Network plans will take account of environmental and community impacts, alongside deliverability and economic cost, from the outset.	to explore a coordinated offshore transmission design under the Offshore Coordination Support Scheme (OCSS). The consortium's feasibility study, submitted in March 2024, concluded that while coordination was technically feasible, it would entail: • An increase in capital costs of up to £890 million • Constraint costs associated with an outage on Sea Link exceeding £500 million • A potential delay of up to five years for North Falls and Five Estuaries Projects Given these significant additional costs and the adverse impact on the timeline for integrating more renewables into the UK energy system—especially in light of the government's commitment to quadruple offshore wind capacity and fully decarbonise the electricity system by 2030—the consortium decided not to pursue a coordinated offshore connection further. North Falls, Five Estuaries, and Sea Link submitted their applications for development to consent in advance of National Grid's Norwich to Tilbury Project. Due to these differing timelines, the Projects are proceeding separately. The Project has considered the cumulative impact of these projects and this is presented in ES Chapter 17: Cumulative Effects (document reference 6.17).
2.8.2	A strategic approach to network planning proposed through the Centralised Strategic Network Planning (CSNP) process will identify strategic investments intended to facilitate achieving net zero and decarbonisation targets.	See response to 2.8.2 above.
2.8.3	In these cases (i.e. where the application is a reinforcement project in its own right and does not accompany an application for a generating station, or is	Primarily, the Project is a network reinforcement and without reinforcement the capacity of the East Anglia existing network is insufficient to accommodate the connection of the proposed

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	not underpinned by a contractually-supported agreement to provide an as-yet-unconsented generating station with a connection), the Secretary of State should have regard to the need case for new electricity networks infrastructure set out in Section 3.3 of EN-1.	new power sources. Increased transmission capability is, therefore, required in the East Anglia region, to allow National Grid to maintain a robust network, remain in accordance with its licence obligations and is required to connect a large number of electricity generators.
2.8.4 and 2.8.5	The Secretary of State should also take into account that Transmission Owners (TOs) and Distribution Network Operators (DNOs) are required under Section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design. TOs and DNOs are also required to facilitate competition in the generation and supply of electricity, and electricity distributors have a statutory duty to provide a connection where requested.	See response to 2.2.10.
2.8.7	Where it can be demonstrated that such a set of works will reinforce the network as a whole, or reinforce the network to accommodate a subset of new connections, the Secretary of State should be willing – in line with the need statement set out in Section 3.3 of EN-1 – to accept an application seeking development consent for the entire set of works.	The Project will reinforce the transmission system in East Anglia. Without reinforcement, the capacity of the existing network in East Anglia is insufficient to accommodate the connection of proposed new power sources connecting in the area. This reinforcement will ensure that the Project will improve the existing electricity transmission network, and will contribute to energy independence, the UK's decarbonisation requirements and climate change targets, and assist in ensuring the supply of energy remains secure, reliable and affordable. As such, the Project is in accordance with this policy.
2.9	**Applicant assessment**	
	Impacts	
	Biodiversity and Geological Conservation	
2.9.3	Electricity networks infrastructure pose a particular potential risk to birdlife including large birds, such as swans and geese, and perching birds. These may	To avoid earthing by design, insulators are of a sufficient size to prevent birds from being able to connect with both the conductor and the earthed pylon at the same time, which could

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	collide with overhead lines and risk being electrocuted. Large birds may also be electrocuted when landing or taking off by completing an electric circuit between live and ground wires. Even perching birds can be killed as soon as their wings touch energised parts of the infrastructure.	result in electrocution. In addition, vegetation clearance in the permanent easement corridor (associated with statutory safety clearances) would be maintained to a three-year growth to avoid branches interfering with the conductors and subsequently birds perching on branches close to power lines which could result in earthing and electrocution. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) concludes that there would be negligible impacts on birds at the operational stage of the Project. The survey data has not highlighted any areas of particular concern with regards to collision that would have an impact of local level or above. In addition, no Qualifying bird species of the Stour and Orwell Estuaries SPA and Ramsar Site were recorded in flight at Ardleigh Reservoir. Cormorant is a species which makes part of a waterbird assemblage on the SPA designation, and was recorded in flight, however the times were insignificant and as such collision risk impact has been screened out of the Habitat Regulations Assessment (HRA) for this site.
2.9.4	Applicants should consider measures to make lines more visible such as bird flappers and diverters which are covered in more detail in paragraphs 2.10.3 and 2.10.4.	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) concludes that there would be negligible impacts on birds at the operational stage of the Project. The survey data has not highlighted any areas of particular concern with regards to collision that would have an impact of local level or above. In addition, no Qualifying bird species of the Stour and Orwell Estuaries SPA and Ramsar Site were recorded in flight at Ardleigh Reservoir. Cormorant is a species which makes part of a waterbird assemblage on the SPA designation, and was recorded in flight, however the times were insignificant and as such collision risk impact has been screened out of the Habitat Regulations Assessment (HRA) for this site. Collision risk and potential mortality in the absence of mitigation is considered to be a negligible effect in the medium term which is non-significant. Precautionary mitigation in the form of bird diverters

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		is proposed between pylons TB15 and TB16 at Ardleigh Reservoir due to the highest number of target birds being noted here and RG87 and RG88 at the River Waveney where the Waveney and Little Ouse Recovery (WaLOR) Project is proposed for this area in which a restoration and enhancement program for the river catchment areas would be delivered. The habitats are therefore likely to become more suitable for waterbirds in the future and therefore precautionary mitigation measures have been implemented.
2.9.5	The applicant will need to consider whether the proposed line will cause such problems at any point along its length and take this into consideration in the preparation of the ES (see Section 4.3 of EN-1).	See response to 2.9.4.
2.9.6	Particular consideration should be given to feeding and hunting grounds, migration corridors and breeding grounds, where they are functionally linked to sites designated or allocated under the 'national site network' provisions of the Conservation of Habitats and Species Regulations.	The full assessment of the impacts and related mitigation measures are detailed in ES Chapter 8: Ecology and Biodiversity (document reference 6.8) submitted as part of this DCO application.
	Landscape and Visual Impact	
2.9.7	While the government does not believe that the development of overhead lines is incompatible in principle with applicants' statutory duty under Schedule 9 to the Electricity Act 1989, to have regard to visual and landscape amenity and to reasonably mitigate possible impacts thereon, in practice new overhead lines can give rise to adverse landscape and visual impacts.	Details on the environmental effects of the different options can be found in ES Chapter 3: Alternatives (document reference 6.3) and Design Development Report (document reference 5.15). The Outline LEMP (document reference 7.4) contains details of planting to help mitigate landscape and visual effects, including reinstatement planting and planting around CSE compounds and substations/substation extensions. The residual landscape and visual effects are set out in ES Chapter 13: Landscape and Visual (document reference 6.13), ES Appendix 13.2:
2.9.8	These impacts depend on the type (for example, whether lines are supported by towers or monopole structures), scale, siting, and degree of screening of the	

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	lines, as well as the characteristics of the landscape and local environment through which they are routed.	Landscape Baseline and Assessment (document reference 6.13.A2) and ES Appendix 13.3: Visual Baseline and Assessment (document reference 6.13.A3). Throughout the design process measures have been taken to reduce the landscape and visual effects of the Project as far as practicable. The landscape and visual amenity assessments indicate that the construction phases would result in significant negative landscape and visual amenity effects. These significant effects are related to the introduction of construction activity and equipment, including the loss of some landscape features including farmland and field boundary vegetation. At Year 15 of operation, following the maturation of mitigation planting within Environmental Areas, the assessment concludes that significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure Projects, as set out in Paragraphs 5.10.5 and 5.10.13 of NPS EN-1.
2.9.9	New substations, sealing end compounds (including terminal towers), and other above-ground installations that serve as connection, switching, and voltage transformation points on the electricity network may also give rise to adverse landscape and visual impacts.	
2.9.10	Cumulative adverse landscape, seascape and visual impacts may arise where new overhead lines are required along with other related developments such as substations, wind farms, and/or other new sources of generation.	
2.9.11	Landscape and visual benefits may arise through the reconfiguration, rationalisation, or undergrounding of existing electricity network infrastructure. Though mitigation of the landscape and visual impacts arising from overhead lines and their associated infrastructure is usually possible, it may not always be so, and the impossibility of full mitigation in these cases does not countermand the need for overhead lines.	The Project includes some rationalisation and undergrounding of the existing electricity network infrastructure, as set out in ES Chapter 4: Project Description (document reference 6.4). Rationalisation and undergrounding have helped to mitigate landscape and visual effects in some areas, as set out in ES Chapter 13: Landscape and Visual (document reference 6.13). Residual landscape and visual effects are set out in ES Appendix 13.2: Landscape Baseline and Assessment (document reference 6.13.A2) and ES Appendix 13.3: Visual Baseline and Assessment (document reference 6.13.A3).
2.9.12	However, in nationally designated landscapes (for instance, National Parks, The Broads and Areas of Outstanding Natural Beauty) even residual impacts may	The Project would pass through Dedham Vale National Landscape. Undergrounding is proposed in the Dedham Vale National Landscape and part of its setting. The setting of the

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	well make an overhead line proposal unacceptable in planning terms. (See Section 2.9.20 below for guidance on this case.)	National Landscape is identified in ES Appendix 13.5: National Landscape Assessment Study, Annex A: Dedham Vale National Landscape Setting Study (document reference 6.13.A5).
2.9.13	Where possible, applicants should ensure that the principles detailed in Sections 2.11.16-2.11.19 below are embodied in the design of their proposed overhead line route and its associated infrastructure. Applicants should also offer proposals (for instance those detailed in Section 2.10 below) for additional mitigation.	Chapter 7 of the Planning Statement (document reference 5.6) sets out how planning policy, namely EN-1 and EN-5. ES Chapter 3: Alternatives (document reference 6.3), the Design and Access Statement (document reference 7.15), Design Approach to Site Specific Infrastructure (document reference 7.16) and Design Development Report (document reference 5.15) describe how the principles of the Holford and Horlock Rules have influenced the options appraisal process demonstrating how such policy objectives have been embedded into the design of the Project.
2.9.14	Where the nature or proposed route of an overhead line will likely result in particularly significant landscape and visual impacts, as would be assessed through landscape, seascape and visual impact assessment, the applicant should demonstrate that they have given due consideration to the costs and benefits of feasible alternatives to the overhead line. This could include – where appropriate – rerouting, underground or subsea cables and the feasibility e.g. in cost, engineering or environmental terms of these. Applicants should note the position on nationally designated landscapes at section 2.9.20 below.	As part of its options appraisal process, National Grid considered whether the use of underground cables, rather than overhead lines, was an appropriate approach in the context of national policy and National Grid's various statutory duties. Undergrounding is proposed in four locations, including through the Dedham Vale National Landscape and part of its setting. The Dedham Vale National Landscape is a nationally important and designated landscape. With the proposed underground cable, the effects on views and setting would be reduced. The other areas of undergrounding are: • Great Horkesley due to the potential effects of OHL on the Dedham Vale National Landscape; • Fairstead to cross the existing 400 kV overhead line; and • Existing YYJ route into the proposed new Tilbury North Substation to reduce effect on housing proposals by less direct land take and technical reasons that avoids outage interface with wider network.

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		Where the effects arising from standard lattice pylons are inconsistent with policy and National Grid's duties, the mitigation hierarchy is applied. The mitigation hierarchy sequentially considers localised specific mitigation measures, pylon position and routeing, low height pylons, T-pylons and the use of underground cables. Applied in this way National Grid can demonstrate compliance with it is duties under the Electricity Act and be assured the Project will be funded. 6.1.29 The context and implications of undergrounding in areas outside nationally designated landscapes have been carefully taken into consideration and appraised. Due regard to the costs, benefits/disbenefits and feasibility of undergrounding to overhead line in areas outside the nationally designated landscape has been backchecked and reviewed throughout the 'design evolution' process with the final position, set out in the 2025 Design Development Report (document reference 5.15).
2.9.15	The ES should set out details of this consideration, including the applicant's rationale for eschewing feasible alternatives to the overhead line, and the mitigation cost-calculation methodology that this rationale may rely upon.	The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. The Design Development Report (document reference 5.15), Design and Access Statement (document reference 7.15) and Design Approach for Site Specific Infrastructure (document reference 7.16) present the different choices made during the design process. These documents should be read alongside both ES Chapter 3: Alternatives (document reference 6.3), which documents the key environmental factors in consideration of the main alternatives, and ES Chapter 13: Landscape and Visual (document reference 6.13).
2.9.16	The Holford Rules – guidelines for the routing of new overhead lines – were originally set out in 1959. These guidelines, intended as a common-sense approach to	National Grid recognise that the Holford Rules and their accompanying notes form the basis for the approach to routeing new 400 kV overhead lines. The Holford Rules have

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	overhead line route design, were reviewed and updated by the industry in the 1990s, and they should be embodied in the applicants' proposals for new overhead lines.	been used when considering alternatives and the need for any additional mitigation measures. The iterative design and assessment of the Project has applied the Holford Rules. Further details on the environmental effects of the different route corridors and alignments can be found in ES Chapter 3: Alternatives (document reference 6.3) The Design Development Report (document reference 5.15), Planning Statement (document reference 5.6) Design and Access Statement (document reference 7.15) and Design Appraisal Approach for Site Specific Infrastructure (document reference 7.16) set out how the Project has taken the Holford and Horlock Rules into account.
2.9.17	In brief, the Holford Rules state that applicants should: • avoid altogether, if possible, the major areas of highest amenity value, by so planning the general route of the line in the first place, even if total mileage is somewhat increased in consequence; • avoid smaller areas of high amenity value or scientific interest by deviation, provided this can be done without using too many angle towers, i.e. the bigger structures which are used when lines change direction; • other things being equal, choose the most direct line, with no sharp changes of direction and thus with fewer angle towers; • choose tree and hill backgrounds in preference to sky backgrounds wherever possible. When a line has to cross a ridge, secure this opaque background as long as possible, cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees; • prefer moderately open valleys with medium or moderate levels of tree cover where the apparent height of towers will be reduced, and views of the line will be broken by trees; • where country is flat and sparsely planted, and unless specifically preferred otherwise by relevant stakeholders, keep the high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and	

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	cables, so as to avoid a concentration of lines or 'wirescape'; and • approach urban areas through industrial zones, where they exist; and when pleasant residential and recreational land intervenes between the approach line and the substation, carefully assess the comparative costs of undergrounding.	
2.9.18	The Horlock Rules – guidelines for the design and siting of substations – were established by National Grid in 2009 in pursuance of its duties under Schedule 9 to the Electricity Act 1989. These principles should be embodied in applicants' proposals for the infrastructure associated with new overhead lines.	National Grid devised the Horlock Rules (National Grid, 2009). The Horlock Rules provide guidelines for the siting and design of new substations, or substation extensions, to avoid or reduce the environmental effects of such developments. They also concern the siting of CSE compounds and line entries. In summary, like the Holford Rules, they facilitate the consideration of environmental factors and amenity within the design and siting of new substation infrastructure. The Horlock Rules were considered during the identification of potential locations for proposed new substations at EACN, Tilbury North and the CSE compounds and line entries. ES Chapter 3: Alternatives (document reference 6.3) and an assessment of the Project against the Holford Rules is set out in The Design Development Report (document reference 5.15), Planning Statement (document reference 5.6) Design and Access Statement (document reference 7.15) and Design Appraisal Approach for Site Specific Infrastructure (document reference 7.16) set out how the Project has taken the Holford and Horlock Rules into account.
2.9.19	In brief, the Horlock Rules state that applicants should: • consider environmental issues from the earliest stage to balance the technical benefits and capital cost requirements for new developments against the consequential environmental effects in order to keep adverse effects to a reasonably practicable minimum. • seek to avoid altogether internationally and nationally designated areas of the highest amenity, cultural or scientific value by the overall planning of the system connections. • protect as far as reasonably practicable areas of local amenity value, important existing habitats and landscape features including ancient woodland, historic hedgerows, surface and ground water sources and nature conservation areas. • take advantage of the screening provided by land form and existing features and the potential use of site layout and levels to keep intrusion into	

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	surrounding areas to a reasonably practicable minimum. • keep the visual, noise and other environmental effects to a reasonably practicable minimum. • consider the land use effects of the proposal when planning the siting of substations or extensions. • consider the options available for terminal towers, equipment, buildings and ancillary development appropriate to individual locations, seeking to keep effects to a reasonably practicable minimum. • use space effectively to limit the area required for development consistent with appropriate mitigation measures and to minimise the adverse effects on existing land use and rights of way, whilst also having regard to future extension of the substation. • make the design of access roads, perimeter fencing, earth-shaping, planting and ancillary development an integral part of the site layout and design, so as to fit in with the surroundings. • in open landscape especially, high voltage line entries should be kept, as far as possible, visually separate from low voltage lines and other overhead lines so as to avoid a confusing appearance. • study the inter-relationship between towers and substation structures and background and foreground features so as to reduce the prominence of structures from main viewpoints. Where practicable the exposure of terminal towers on prominent ridges should be minimised by siting towers against a background of trees rather than open skylines.	

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	Undergrounding and subsea cables	
2.9.20	Although it is the government's position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, The Broads, or Area of Outstanding Natural Beauty).	No overhead lines are proposed within the Dedham Vale National Landscape. Approximately 16.8 km of underground cable is proposed in Section C of which 5.7 km would be through the National Landscape designation. ES Appendix 13.5: National Landscape Assessment Study (document reference 6.13.A5) describes the effects of the Project on Dedham Vale National Landscape during construction and operation. The Project would be undergrounded through Dedham Vale National Landscape and adjacent landscapes. A CSE compound would be located to the east of Raydon Great Wood, approximately 2 km to the north-east of the National Landscape at its closest point. The Project would then transition back to overhead line, heading north away from the National Landscape. To the south-east of Dedham Vale National Landscape, the underground cable route would continue outside the National Landscape and terminate at a new substation known as the EACN Substation, approximately 1.3 km south of the National Landscape. The Project would run on overhead line between the EACN Substation and Great Horkesley to the west. A further section of undergrounding is proposed to the south-west of the National Landscape at Great Horkesley, where the Project is within the setting of the National Landscape (see ES Appendix 13.5: National Landscape Assessment Study (document reference 6.13.A5)). The CSE compounds are located approximately 1.3 km to the south of the National Landscape at both ends of this underground section. The Project would then transition back to overhead line, before heading south away from the National Landscape.
2.9.21	In these areas, and where harm to the landscape, visual amenity and natural beauty of these areas cannot feasibly be avoided by rerouting overhead lines, the strong starting presumption will be that the applicant should underground the relevant section of the line.	
2.9.22	However, undergrounding will not be required where it is infeasible in engineering terms, or where the harm that it causes (see section 2.11.4) is not outweighed by its corresponding landscape, visual amenity and natural beauty benefits. Regardless of the option, the scheme through its design, delivery, and operation, should seek to further the statutory purposes of the designated landscape. These enhancements may go beyond the mitigation measures needed to minimise the adverse effects of the scheme.	
2.9.23	Additionally, cases will arise where – though no part of the proposed development crosses a designated landscape – a high potential for widespread and	Undergrounding was considered appropriate in parts of the setting of the Dedham Vale National Landscape (within Sections C and D), as well as within the National Landscape

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	significant adverse landscape and/or visual impacts along certain sections of its route may result in recommendations to use undergrounding for relevant segments of the line or alternatively consideration of using a route including subsea cabling.	itself. The setting of the National Landscape is identified in ES Appendix 13.5: National Landscape Assessment Study, Annex A: Dedham Vale National Landscape Setting Study (document reference 6.13.A5). Undergrounding is proposed in four locations, including through the Dedham Vale National Landscape and part of its setting. The Dedham Vale National Landscape is a nationally important and designated landscape. With the proposed underground cable, the effects on views and setting would be reduced. The other areas of undergrounding include: • Great Horkesley due to the potential effects of OHL on the Dedham Vale National Landscape; • Fairstead to cross the existing 400 kV overhead line; and • Existing YYJ route into the proposed new Tilbury North Substation to reduce effect on housing proposals by less direct land take and technical reasons that avoids outage interface with wider network. Hence, adopting the case-by-case approach to undergrounding and a consistent Project approach to undergrounding, the extent of undergrounding proposed is considered appropriate. Further information about undergrounding is provided in the Design Development Report (document reference 5.15) and Consultation Report (document reference 5.1A and B).
2.9.24	In these cases, and taking account of the fact that the government has not laid down any further rule on the circumstances requiring use of underground or subsea cables, the Secretary of State must weigh the feasibility, cost, and any harm of the undergrounding or subsea option against:	Overhead lines are normally less disruptive to construct than underground cables, for example they can pass over the top of sensitive features such as rivers, hedgerows and tree belts with relatively little disturbance to habitats. They are also cheaper to install and easier to maintain, whilst allowing the land to be reinstated more quickly than underground cables. Overhead lines require a much smaller footprint (limited to

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	• the adverse implications of the overhead line proposal; • the cost and feasibility of re-routing overhead lines or mitigation proposals for the relevant line section; and • the cost and feasibility of the reconfiguration, rationalisation, and/or use of underground or subsea cabling of proximate existing or proposed electricity networks infrastructure.	pylon bases, and any temporary construction land such as access routes and construction areas). Therefore, they are typically of lower impact on ground features such as ecology, archaeology, drainage and groundwater flows. Overhead lines are easy to inspect, repair and maintain, as works can be undertaken to the above ground components with little disturbance to land use. However, overhead lines can have a visual impact, particularly in areas of high landscape value. Underground cables by comparison, have higher construction costs compared to overhead lines. In addition, the cost of loss of service and that of repairs is greater for cables because the faulted section of cable needs to be excavated to allow for repairs. Furthermore, National Grid holds the Transmission Licence for England and Wales and is, therefore, regulated by Ofgem, the electricity and gas markets regulator, to ensure value for money for consumers and is required under the Electricity Act to 'develop and maintain an efficient, coordinated and economical electricity transmission system, and to facilitate competition in supply and generation of electricity.' These duties and obligations mean that National Grid has a responsibility to deliver new electricity transmission infrastructure but also to be responsible for the cost of Projects as costs will ultimately be borne by electricity users. Overall, National Grid is confident that the Project strikes the appropriate balance of overhead line and underground cables.
2.9.25	In such cases the Secretary of State should only grant development consent for underground or subsea sections of a proposed line over an overhead alternative if they are satisfied that the benefits accruing from the former proposal clearly outweigh any extra economic, social, or environmental impacts that it presents, the mitigation hierarchy has been followed, and that any	The cost of, and scope for, developing outside the National Landscape or meeting the need in some other way has been considered as part of the evolution of the Project. ES Chapter 3: Alternatives (document reference 6.3) describes the routeing decision made by National Grid to route directly through the Dedham Vale National Landscape (using underground cables) or take a longer route around it. The direct route with

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	technical obstacles associated with it are surmountable. In this context it should consider: • the landscape and visual baseline characteristics of the setting of the proposed route, in particular, the impact on high sensitivity visual receptors (as defined in the current edition of the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment), residential areas, designated landscapes, valued landscapes, designated heritage assets and Heritage Coasts (including, where relevant, impacts on the setting of designated features and areas), noting the policy in EN-1 section 5.4.53 on regional and local designations; • the additional cost of the proposed underground or sub-sea alternatives, including their significantly higher lifetime cost of repair and later uprating; • the potentially very disruptive effects of undergrounding on local communities, habitats, archaeological and heritage assets, marine environments, soil (including peat soils), hydrology, geology, and, for a substantial time after construction, landscape and visual amenity. (Undergrounding an overhead line will mean digging a trench along the length of the route, and so such works will often be disruptive – albeit temporarily – to the receptors listed above than would an overhead line of equivalent rating); • the potentially very disruptive effects of subsea cables on the seabed and the species that live in and on it, including physical damage to and full loss of seabed habitats. Cable protection can also be required where cables cross each other, or where they cannot be buried deep enough to protect them	underground cables was selected as it halves the connection length, avoids creating a third connection between Bramford and Twinstead, and better complies with the Holford Rules, despite requiring underground cable mitigation through the National Landscape. Landscape and visual effects are considered in ES Chapter 13: Landscape and Visual (document reference 6.13) and ES Appendix 13.5: National Landscape Assessment Study, Annex A: Dedham Vale National Landscape Setting Study (document reference 6.13.A5). Ecological and Biodiversity effects are considered in ES Chapter 8: Ecology and Biodiversity (document reference 6.8). Impacts on Habitats are set out in in ES Appendix 8.1: Habitat Report (document reference 6.8.A1). Impacts on archaeology and heritage assets are set out in ES Chapter 11: Historic Environment (document reference 6.11), ES Appendix 11.2: Historic Environment Assessment Tables (document reference 6.11.A2), ES Appendix 11.4: Geophysical Survey Results Report (document reference 6.11.A4), ES Appendix 11.5: Trial Trenching Results Report (document reference 6.11.A5), ES Appendix 11.6: Geoarchaeological and Archaeological Monitoring of Ground Investigation Works Report (document reference 6.11.A6) and ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets (document reference 6.11.A7). Community impacts are considered in ES Chapter 15: Socio-economics, Recreation and Tourism (document reference 6.15). Impacts on soils and agriculture are considered in ES Chapter 6: Agriculture and Soils (document reference 6.6).

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	from becoming exposed. Such protection causes additional impacts that are often greater than those of the cable itself due to the large areas covered. There can also be issues where subsea cables make landfall, as much coastal land is protected habitat with environmental and heritage designations and landfall connections could cause additional disruption to coastal communities and the environment; • the applicant's commitment, as set out in their ES, to mitigate the potential detrimental effects of undergrounding works on any relevant agricultural land and soils (including peat soils), particularly regarding Best and Most Versatile land, including development and implementation of a Soil Resources and Management Plan. Such a commitment must guarantee appropriate handling of soil, backfilling, and return of the land to the baseline Agricultural Land Classification (ALC), thus ensuring no loss or degradation of agricultural land. Such a commitment should be based on soil and ALC surveys in line with the 1988 ALC criteria and due consideration of the Defra Construction Code of Practice for Sustainable Use of Soils on Construction Sites.	
	Noise and Vibration	
2.9.26	All high voltage transmission lines have the potential to generate noise under certain conditions.	Operational noise from overhead lines is scoped out of the ES, in accordance with the Scoping Opinion (document reference 6.20), on the basis that a low noise conductor system is proposed. However, information on noise from overhead lines is provided in ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) (document reference 6.14.A5).

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2.9.37 and 2.9.38	Audible noise effects can also arise from substation equipment such as transformers, quadrature boosters and mechanically switched capacitors. Transformers are installed at many substations, and generate low frequency hum. Whether the noise can be heard outside a substation depends on a number of factors, including transformer type and the level of noise attenuation present (either engineered intentionally or provided by other structures).	ES Chapter 14: Noise and Vibration (document reference 6.14) details the likely significant effects associated with construction noise and vibration, construction traffic noise, operational noise from the proposed EACN Substation and Tilbury North Substation and operational vibration. Operational traffic noise and operational noise from overhead lines and underground cables have not been assessed due to the likely low level noise generation from these aspects of the Project. The assessment of operation noise is presented in ES Appendix 14.3: EACN Substation Operational Noise Assessment (document reference 6.14.A3) and ES Appendix 14.4: Tilbury North Substation Operational Noise Assessment (document reference 6.14.A4). With embedded and standard mitigation measures, the impact of operational noise from the proposed substations on all nearby NSR, has been assessed as having a negligible or small magnitude impact, during both daytime and night-time periods, taking account of context. This would result in a residual negligible to minor adverse effect at all nearby NSR, which is considered to be not significant. The assessment is indicative for the purpose of demonstrating that significant adverse effects can be avoided. The assessment is based on early design information and standard noise mitigation measures. Further detailed design would be undertaken by the developers, including consideration of specific noise mitigation measures.
2.9.40	For the assessment of noise from overhead lines, the applicant must use an appropriate method to determine the sound level produced by the line in both dry and wet weather conditions, in addition to assessing the impact on noise-sensitive receptors.	See response to 2.9.26.

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2.9.41	For instance, the applicant may use an appropriate noise modelling tool or tools for the prediction of overhead line noise and its propagation over distance, such as an ISO 9613-2 or Technical Report TR(T)94.	Technical Report TR(T)94 has been withdrawn by National Grid and is superseded by National Grid document PS(T)134 Operational Audible Noise Policy for Overhead Lines (new build, reconductoring, diversion and uprating). The assessment in ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) (document reference 6.14.A5) follows the guidance presented in PS(T)134 and the overhead line noise prediction model in EFC-400 follows ISO 9613-2.
2.9.42	When assessing the impact of noise generated by overhead lines in wet weather relative to existing background sound levels, the applicant should consider the effect of varying background sound levels due to rainfall.	See response to 2.9.26.
2.9.43	The Secretary of State is likely to regard it as acceptable for the applicant to use a methodology that demonstrably addresses these criteria.	See response to 2.9.26.
	Electric and Magnetic Fields (EMFs)	
2.9.46	All overhead power lines produce EMFs. These tend to be highest directly under a line and decrease to the sides at increasing distance. Although putting cables underground eliminates the electric field, they still produce magnetic fields, which are highest directly above the cable. EMFs can have both direct and indirect effects on human health, aquatic and terrestrial organisms.	Noted and discussed in Sections 1 and 2 of the Electric and Magnetic Field Compliance Report (document reference 7.8).
2.9.47	The direct effects occur in terms of impacts on the central nervous system resulting in its normal functioning being affected. Indirect effects occur through electric charges building up on the surface of the body producing a microshock on contact with a grounded object, or vice versa, which, depending on the field	Both direct and indirect EMF effects of the Project have been assessed in the Electric and Magnetic Field Compliance Report (document reference 7.8).

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	strength and other exposure factors, can range from barely perceptible to being an annoyance or even painful.	
2.9.48	To prevent these known effects, the International Commission on Non-Ionizing Radiation Protection (ICNIRP) developed health protection guidelines in 1998 for both public and occupational exposure. These are expressed in terms of the induced current density in affected tissues of the body, 'basic restrictions', and in terms of measurable 'reference levels' of electric field strength (for electric fields), and magnetic flux density (for magnetic fields). The relationship between the (measurable) electric field strength or magnetic flux density and induced current density in body tissues requires complex dosimetric modelling.	The ICNIRP 1998 guidelines form the basis of the assessment of EMF for the Project. The Project is compliant with the ICNIRP 1998 guidelines as demonstrated in the Electric and Magnetic Field Compliance Report (document reference 7.8).
2.9.49	The reference levels are such that compliance with them will ensure that the basic restrictions are not reached or exceeded. Exceeding the reference levels does not necessarily mean that the basic restrictions will not be met; this would be a trigger for further investigation into the specific circumstances.	Noted and this forms the basis of the EMF compliance assessment applied to the Project in the Electric and Magnetic Field Compliance Report (document reference 7.8).
2.9.50	For protecting against indirect effects, the ICNIRP 2020 guidelines give an electric field reference of 5kV m-1 for the general public and keeping electric fields below this level would reduce the occurrence of adverse indirect effects for most individuals to acceptable levels. When this level is exceeded, there is a suite of measures that may be called upon in particular situations, including provision of information, earthing and screening, alongside limiting the field. In some situations, there may be no reasonable way of eliminating indirect effects.	The ICNIRP 2020 guidelines cover radio-frequency EMFs in the range of 100 kHz to 300 GHz. These provide no electric field reference levels at 50 Hz. National Grid is unclear on the application of ICNIRP 2020 to EMF for electricity assets and are aiming to clarify this point with DESNZ.

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2.9.51	The levels of EMFs produced by power lines in normal operation are usually considerably lower than the ICNIRP 2020reference levels. For electricity substations, the EMFs close to the sites tend to be dictated by the overhead lines and cables entering the installation, not the equipment within the site.	The ICNIRP 2020 guidelines cover the frequency ranges 100 kHz to 300 GHz and are not applicable to 50 Hz power-frequencies. National Grid is unclear on the application of ICNIRP 2020 guidelines to EMF for electricity assets and are aiming to clarify this point with DESNZ.
2.9.54	In March 2004, the National Radiological Protection Board (now part of NIHP CRCE), published advice on limiting public exposure to electromagnetic fields. The advice recommended the adoption in the UK of the EMF exposure guidelines published by ICNIRP in 2020.	Noted. In March 2004 the National Radiological Protection Board recommended the adoption of guidelines published by ICNIRP in 1998. It is the ICNIRP 1998 guidelines that have been applied to the Electric and Magnetic Field Compliance Report (document reference 7.8). The ICNIRP 2020 guidelines cover the frequency ranges 100 kHz to 300 GHz and are not applicable to 50 Hz power-frequencies. National Grid is unclear on the application of ICNIRP 2020 guidelines to EMF for electricity assets and are aiming to clarify this point with DESNZ.
2.9.55	These guidelines also form the basis of the Control of Electromagnetic Fields at Work Regulations 2016. Resulting from these recommendations, government policy is that exposure of the public should comply with the ICNIRP (2020) guidelines. The electricity industry has agreed to follow this policy. Applications should show evidence of this compliance as specified in 2.10.11.	The ICNIRP 2010 guidelines form the basis of 50 Hz component of the Control of Electromagnetic Fields at Work Regulations 2016. ICNIRP 2020 guidelines cover radio-frequency exposures, which are not applicable to electricity infrastructure Projects of this nature. National Grid is unclear on the application of the ICNIRP 2020 guidelines to EMF for electricity assets and are aiming to clarify this point with DESNZ
2.9.57	The Department of Health and Social Care's Medicines and Healthcare Products Regulatory Agency does not consider that transmission line EMFs constitute a significant hazard to the operation of pacemakers.	This presents no change to current policy and was considered in Section 2.10 of the Electric and Magnetic Field Compliance Report (document reference 7.8).

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	Sulphur Hexafluoride	
2.9.61	Applicants should at the design phase of the process consider carefully whether the proposed development could be reconceived to avoid the use of SF6-reliant assets.	As outlined in ES Appendix 4.1: Greenhouse Gas Assessment (document reference 6.4.A1), it is assumed that no SF6 equipment will be used in the Project, in accordance with National Grid policy. SF6 alternatives such as C4 or G3 have a 99% lower global warming potential (GWP) than SF6.
2.9.62	Where the development cannot be so conceived, the applicant must provide evidence of their reasoning on this point. Such evidence will include, for instance, an explanation of the alternatives considered, and a case why these alternatives are technically infeasible or require bespoke components that are grossly disproportionate in terms of cost.	
2.9.63	In particular, an accounting of the cost differential between the SF6- reliant asset and the appropriate SF6-free alternative should be provided.	
2.9.64	Where applicants, having followed the above procedure, do propose to put new SF6-reliant assets onto the electricity system, they should design a plan for the monitoring and control of fugitive SF6 emissions consistent with the Fluorinated gas (F-gas) Regulation and its successors.	
2.10	**Mitigation**	
2.10.1	The applicant should consider and address routing and avoidance/minimisation of environmental impacts both onshore and offshore at an early stage in the development process	As outlined in ES Appendix 4.1: Greenhouse Gas Assessment (document reference 6.4.A1), it is assumed that no SF6 equipment will be used in the Project, in accordance with National Grid policy. SF6 alternatives such as C4 or G3 have a 99% lower global warming potential (GWP) than SF6.
	Biodiversity and Geological conservation	
2.10.3	Making lines more visible by methods such as the fitting of bird flappers and diverters to the earth wire, which	See response to 2.9.3.

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	swivel in the wind, glow in the dark and use fluorescent colours designed specifically for bird vision can also reduce the number of deaths. The design and colour of the diverters will be specific to the conditions – the line and pylon/transmission tower specifications and the species at risk.	
2.10.4	Electrocution risks can be reduced through the design of lattice steel tower crossarms, insulators and the construction of other parts of high voltage power lines so that birds find no opportunity to perch near energised power lines on which they might electrocute themselves.	See response to 2.9.3.
	Landscape and Visual	
2.10.5	In addition to good design in accordance with the Holford and Horlock rules (please see paragraphs 2.9.16 - 2.9.19), and the consideration of undergrounding or rerouting the line where possible, the principal opportunities for mitigating adverse landscape and visual impacts of electricity networks infrastructure are: • consideration of network reinforcement options (where alternatives exist) which may allow improvements and/or extensions to an existing line rather than the building of an entirely new line; • selection of the most suitable type and design of support structure in order to minimise the overall visual impact on the landscape. In particular, ensuring that towers are of the smallest possible footprint and internal volume; and • the rationalisation, reconfiguration, and/or undergrounding of existing electricity networks	Consideration of design for the Project, in accordance with the Holford and Horlock rules, is set out in ES Chapter 3: Alternatives (document reference 6.3), the Design Development Report (document reference 5.15), Planning Statement (document reference 5.6) Design and Access Statement (document reference 7.15) and Design Appraisal Approach for Site Specific Infrastructure (document reference 7.16). Embedded mitigation measures have been integral in reducing, and where possible, avoiding, the landscape and visual effects of the Project. Landscape and visual matters were considered in the early stages of siting and design. ES Chapter 3: Alternatives (document reference 6.3) provides an overview of the design rationale for the Project. It explains how the Project has sought to avoid or reduce significant environmental effects, including landscape and visual effects, wherever practicable, from the initial option identification and selection stage up to the refinement of the Project in response to feedback, further assessments and design work. The site selection process and consideration of alternatives are also

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	infrastructure in the vicinity of the proposed development.	summarised in ES Chapter 3: Alternatives (document reference 6.3) which shows that a wide range of alternatives were considered in the design of the Project, taking into account the EIA process, ground investigations and feedback from consultees received from formal consultation exercises and Project meetings. Relevant mitigation measures are set out in the Outline CoCP (document reference 7.2). New steel lattice pylons, (including low height pylons at Thurrock Airfield and Little Waltham) have been chosen as the preferred option to support the conductors (rather than T-pylons). Lattice pylons offer the advantage of thin steel members in in an open structure, making background features visible beyond, helping them to visually recede. Further technical characteristics of the Project are discussed in ES Chapter 4: Project Description (document reference 6.4).
2.10.6	Additionally, there are more specific measures that might be taken, and which the Secretary of State could mandate through DCO requirements if appropriate, as follows: • landscape schemes, comprising off-site tree and hedgerow planting, are sometimes used for larger new overhead line projects to mitigate potential landscape and visual impacts, softening the effect of a new above ground line whilst providing some screening from important visual receptors. These may be implemented with the agreement of the relevant landowner(s), or the developer may compulsorily acquire the land or land rights in question. Advice from the relevant statutory authority may also be needed; and	Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features as far as reasonably practicable. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse residual landscape and visual effects. National Grid has also embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project. Embedded mitigation measures relevant to landscape and visual amenity include: Sensitive routeing and siting of the alignment and Order Limits - as far as practicable effects on identified environmental (including landscape and visual, ecology and heritage assets)

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	• screening, comprising localised planting in the immediate vicinity of residential properties and principal viewpoints can also help to screen or soften the effect of the line, reducing the visual impact from a particular receptor.	and socio-economics receptors have been avoided and reduced. ES Chapter 3: Alternatives (document reference 6.3) summarises the Project routeing and site selection process and consideration of alternatives. Undergrounding is proposed in four locations, including through the Dedham Vale National Landscape and part of its setting. The Dedham Vale National Landscape is a nationally important and designated landscape. With the proposed underground cable, the effects on views and setting will be reduced. Prior to the commencement of construction works for the Project, several existing overhead and underground third-party services would need to be diverted, removed, undergrounded, or protected. The Project would follow the route of existing 132 kV overhead lines north of Flowton and north of Mellis, where the existing 132 kV overhead lines would be undergrounded. This would help to reduce landscape and visual effects. The Project allows for the use of full line tension gantries at CSE compounds and substations (where design allows). The use of full tension gantries removes the need for a bulkier terminal pylon adjacent to the CSE compound which would reduce visual clutter and therefore help to reduce landscape and visual effects. The Project allows for landscape planting around CSE compounds, the new EACN Substation, south of the new Tilbury North Substation and the existing Norwich Main Substation and its extension. These are presented as 'Environmental Areas' on ES Figure 4.1: Proposed Project Design (document reference 6.4.F1) and ES Figure 4.2: Proposed Project Design – Permanent Features (document reference 6.4.F2). Further details including landscape plans and planting schedules are provided in the Outline LEMP (document reference 7.4).

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		Replacement planting would be undertaken at the earliest opportunity given the right planting season to mitigate, where practicable, vegetation removed during construction. National Grid have considered the proposed materials and colour palette for the CSE compounds and new substation / substation extension, including buildings, security fencing, equipment, and surfacing to be sensitive to the environment they are located in, where practicable. Further information is included in the Design Approach for Site Specific Infrastructure (document reference 7.16).
2.10.7	As set out in the paragraphs above, where landscape schemes and/or screening mitigation of the kind described above is required, rights over the land necessary for such measures may be compulsorily acquired as part of the DCO.	The Environmental Areas are located on land to be acquired by National Grid and any habitats included within the BNG onsite mitigation will be monitored and managed by National Grid for 30 years in line with commitments made within the BNG Report (document reference 7.1).
2.10.8	Furthermore, since long-term management of the selected mitigation schemes is essential to their mitigating function, a management plan, developed at least in outline at the conclusion of the examination, and which sets out proposals within a realistic timescale, should secure the integrity and benefit of these schemes. This should also uphold the landscape commitments made to achieve consent, alongside any pertinent commitments to environmental and biodiversity net gain.	Areas of planting proposed for biodiversity net gain, as described in the Biodiversity Net Gain Report (document reference 7.1) would be subject to a 30-year management plan. National Grid has also committed to a up to 30-year aftercare period for the mitigation planting.
	Noise and vibration	
2.10.9	Applicants must consider the following measures: • the positioning of lines to help mitigate noise; • ensuring that the appropriately sized conductor arrangement is used to minimise potential noise;	As per response to 2.9.27.

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	• quality assurance through manufacturing and transportation to avoid damage to overhead line conductors which can increase potential noise effects; • ensuring that conductors are kept clean and free of surface contaminants during stringing/installation; and • the selection of quieter cost-effective plants.	
2.10.10	In addition, the ES should include information on planned maintenance arrangements. Where detail is not included, the Secretary of State should consider stipulating appropriate maintenance arrangements by way of requirements attached to any grant of development consent.	ES Chapter 6.14: Noise and Vibration (document reference 6.14) considers noise generated by operational maintenance and concludes that operational maintenance is not expected to generate high levels of noise or vibration and would generally involve relatively short-term activities.
	Electric and Magnetic Fields (EMFs)	
2.10.11	The applicant should consider the following factors: • height, position, insulation and protection (electrical or mechanical as appropriate) measures subject to ensuring compliance with the Electricity Safety, Quality and Continuity Regulations 2002; • that optimal phasing of high voltage overhead power lines is introduced wherever possible and practicable in accordance with the Code of Practice to minimise EMFs; and • any new advice emerging from the Department of Health and Social Care relating to government policy for EMF exposure guidelines.	Sections 2.12 and 6.2 of the Electric and Magnetic Field Compliance Report (document reference 7.8) demonstrates that the Project has been designed to comply with the statutory requirements of the Electricity Safety, Quality and Continuity Regulations 2002 and that optimal phasing has been applied in accordance with the Codes of Practice. National Grid are committed to following government policy on EMF exposure guidelines applying new advice when where appropriate.
2.10.12	Where it can be shown that the line will comply with the current public exposure guidelines and the policy on phasing, no further mitigation should be necessary.	The overhead line has been designed in compliance with the policy on optimum phasing as specified in the Code of Practice

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		on Optimum Phasing, as demonstrated in the Electric and Magnetic Field Compliance Report (document reference 7.8).
2.10.13	Where EMF exposure is within the relevant public exposure guidelines, re-routeing a proposed overhead line purely on the basis of EMF exposure or undergrounding a line solely to further reduce the level of EMF exposure are unlikely to be proportionate mitigation measures.	The Project has been designed and assessed in line with the Code of Practice - Power Lines: Demonstrating compliance with EMF exposure guidelines. All the EMF produced comply with relevant public exposure guidelines provided by ICNIRP 1998 as demonstrated in the Electric and Magnetic Field Compliance Report (document reference 7.8). National Grid considered these as the relevant public exposure guidelines as they cover power-frequency EMF exposures rather than radio frequencies EMFs covered by the ICNIRP 2020 guidance. No additional EMF mitigation has been applied.
	Sulphur Hexafluoride	
2.10.14	The climate-warming potential of SF6 is such that applicants should, as a rule, avoid the use of SF6 in new developments.	See the response to 2.9.62.
2.10.15	Where no proven SF6-free alternative is commercially available, and where the cost of procuring a bespoke alternative is grossly disproportionate, the continued use of SF6 is acceptable, provided that emissions monitoring and control measures compliant with the F-gas Regulation and/or its successors are in place.	See the response to 2.9.64.
2.11	**Secretary of State decision making**	
	Impacts Biodiversity and Geological conservation	
2.11.1	Where biodiversity impacts are identified, including those associated with bird collision with overhead lines, the Secretary of State should be satisfied that all feasible options for mitigation have been considered and evaluated appropriately.	As set out in ES Chapter 8: Ecology and Biodiversity (document reference 6.8) the Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project.

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		There will be impacts on Habitats of Principal Importance e.g. arable field margins, lowland meadows, ponds, wet woodlands and hedgerows during the construction and operational phases. During the construction phase, habitats would be temporarily removed to create haul road, site compounds and storage areas. Habitats that are within the footprint of the permanent infrastructure that includes pylons CSE compounds and substations will be permanently removed. The Habitats of Principal Importance that would be lost on a temporary basis would be reinstated in line with the habitat reinstatement principles set out in Chapter 9 of the Outline LEMP (document reference 7.4). Mitigation for the permanent loss of habitat, including habitats of principal importance and important hedgerows would be delivered through the creation / enhancement of habitat associated with the biodiversity net gain for the Project. Within the Order Limits six areas of land (defined as Environmental Areas) will be utilised around the Project's permanent assets, where there is sufficient space. To ensure the biodiversity net gain target is reached, any additional creation / enhancement will be delivered outside of the Order Limits, as identified in the Biodiversity Net Gain Report (document reference 7.1). National Grid has embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project. Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features such as woodland as far as reasonably practicable. As set out in Chapter 6 of the Outline LEMP (document reference 7.4), removal and manipulation of habitat known to support hazel dormouse would take place under licence to Natural England (the current licensing body). With details to be approved by Natural England. Vegetation

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		removal will be overseen by the licensed ecologists with removal staged to enable vegetation to be searched for individual dormice before it is cut to ground level, with further searches to confirm the absence of hazel dormouse before stumps are moved and the area identified as 'free' of constraints. Nest boxes will be installed in areas of retained vegetation to mitigate for the loss of natural nest sites. Following the implementation of mitigation measures identified in the Outline CoCP (document reference 7.2), no residual significant adverse effects on roosting, foraging or commuting bats, Schedule 1 birds or wintering passage birds, reptiles, otter, water vole, badger or species of principal importance are identified. No significant effects on above species have been identified during the operational phase.
	Landscape and Visual	
2.11.2	The Secretary of State should be satisfied that the development, so far as is reasonably possible, complies with the Holford and Horlock Rules (please see paragraphs 2.9.16 - 2.9.19) or any updates to them.	The Design Development Report (document reference 5.15), the Design and Access Statement (document reference 7.15) and the Design Approach to Site Specific Infrastructure (document reference 7.16) describe how the Holford and Horlock Rules, have influenced the optioneering and design evolution process, demonstrating how such policy and legislative objectives have been embedded into the design of the Project. Both sets of rules have been deployed by National Grid and have formed an important part of developing the preferred route and design of the Project. For example, the route seeks to avoid siting infrastructure in areas with significant amenity value; the most direct route is preferred to avoid the need for additional angle pylons; siting infrastructure in areas benefiting from existing advantageous vegetation screening is preferred; and densely populated urban/residential areas are avoided, where possible.
2.11.3	The Secretary of State should also be satisfied that all feasible options for mitigation – including the	Once the need for the Project was established, National Grid considered the different ways in which this need could be met,

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	rationalisation, reconfiguration, or undergrounding of existing electricity networks infrastructure, have been considered and evaluated appropriately.	to generate a preferred strategic proposal. The alternatives considered at this stage comprised different technologies, different geographical connection points, or a combination of the two. ES Chapter 3: Alternatives (document reference 6.3) considered 5 options drawn from a long list of 27. Subsequently, the design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. ES Chapter 3: Alternatives (documents reference 6.3)) provides an overview of the design rationale for the Project. It explains how the Project will avoid or reduce significant environmental effects, including landscape and visual effects, wherever practicable, from the initial option identification and selection stage up to the refinement of the Project in response to feedback, further assessments and design work. The site selection process and consideration of alternatives are also summarised in ES Chapter 3: Alternatives (document reference 6.3) which shows that a wide range of alternatives were considered in the design of the Project, taking into account the EIA process, ground investigations and feedback from consultees received from formal consultation exercises and Project meetings The Design Development Report (document reference 5.15), Design and Access Statement (document reference 7.15) and Design Approach for Appraisal of Site Specific Infrastructure (document reference 7.16) and Design and Access Statement and Planning Statement (document reference 5.6) should be read alongside both ES Chapter 3: Alternatives (document reference 6.3), which documents the key environmental factors in consideration of the main alternatives, and Chapter 5 of the Planning Statement (document reference: 5.6) which explains how planning policy, as well as the requirements of the Electricity Act and the principles of the Holford and Horlock

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		Rules, have influenced the optioneering and design evolution process.
2.11.14	In circumstances where it can be demonstrated that a mitigation measure and/ or technological approach is appropriate and/ or necessary for a Project, including to limit landscape and visual impact as set out above, the Secretary of State should take this into account in decision making.	See response to 2.9.11.
2.11.5	Nationally designated landscapes have specific statutory purposes which help ensure their continued protection. The Secretary of State should have special regard to nationally designated landscapes, where the general presumption in favour of overhead lines should be reversed to favour undergrounding.	See response to 2.9.12.
2.11.6	Away from these protected landscapes and in locations where there is a high potential for widespread and significant adverse landscape and/or visual impacts, the Secretary of State should be satisfied that the applicant has provided evidence to support a decision on whether undergrounding is or is not appropriate, having considered this on a case-by-case basis, weighing the considerations in paragraph 2.9.24 above.	See response to 2.9.23.
	Noise and vibration	
2.11.7	The Secretary of State should ensure that appropriate assessment methodologies have been used in the evidence presented to it, and that the appropriate mitigation options have been considered and adopted. Where the applicant can demonstrate that appropriate mitigation measures will be put in place, the residual noise impacts are unlikely to be significant.	The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce noise and vibration impacts and effects through the process of design development, and by embedding measures into the design of the Project. ES Chapter 14: Noise and Vibration (document reference 6.14) presents the assessment of the noise and vibration effects.

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		Operational noise from overhead lines is scoped out of the ES, in accordance with the Scoping Opinion (document reference 6.20), on the basis that a low noise conductor system is proposed. However, information on noise from overhead lines is provided in ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) (document reference 6.14.A5).
2.11.8	Consequently, noise from overhead lines is unlikely to lead to the Secretary of State refusing an application, but it may need to consider the use of appropriate requirements in the DCO to ensure noise is minimised as far as is practicable.	Operational noise from overhead lines is scoped out of the ES, in accordance with the Scoping Opinion (document reference 6.20), on the basis that a low noise conductor system is proposed. However, information on noise from overhead lines is provided in ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) (document reference 6.14.A5).
	Electric and Magnetic Fields (EMFs)	
2.11.9	This NPS does not repeat the detail of the ICNIRP 2020 guidelines on restrictions or reference levels. The government has developed with the electricity industry a Code of Practice, 'Power Lines: Demonstrating compliance with EMF public exposure guidelines – a voluntary Code of Practice', published in February 2011 that specifies the evidence acceptable to show compliance with ICNIRP (2020) guidelines and is also in line with the terms of the 1999 EU Council Recommendation on EMF exposure.	The Code of Practice provides a practical way to demonstrate compliance with the ICNIRP 1998 guidelines applicable to 50 Hz power-frequency EMFs. This Code of Practice provides no guidance on how to assess compliance of power lines with the ICNIRP 2020 guidelines. National Grid is unclear on the application of ICNIRP 2020 guidelines to EMF for electricity assets and are aiming to clarify this point with DESNZ.
2.11.11	Industry currently applies optimal phasing to 275kV and 400kV overhead lines voluntarily wherever operationally possible, which helps to minimise the effects of EMF. The government has developed with industry a voluntary Code of Practice, 'Optimum Phasing of high voltage double-circuit Power Lines – A Voluntary Code of Practice'30, published in March 2012, that defines the circumstances where industry can and will optimally phase lines with a voltage of 132kV and above.	The code of practice on optimum phasing has been applied to the Project as detailed in the Electric and Magnetic Field Compliance Report (document reference 7.8).

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2.11.12	Where the applicant cannot demonstrate that the line will be compliant with the Electricity Safety, Quality and Continuity Regulations 2002, with the exposure guidelines as specified in the Code of Practice on compliance, and with the policy on phasing as specified in the Code of Practice on optimal phasing then the Secretary of State should not grant consent.	See response to 2.10.11.
2.11.13	Undergrounding of a line would reduce the level of EMFs experienced, but high magnetic field levels may still occur immediately above the cable. It is the government's policy that power lines should not be undergrounded solely for the purpose of reducing exposure to EMFs.	Noted. Undergrounding on the Project has not been undertaken on EMF grounds.
2.11.15	Where a statutory consultee on the safeguarding of technical facilities identifies a risk that the EMF effect of electricity network infrastructure would compromise the effective and safe operation of such facilities, the potential impact and siting and design alternatives will need to have been fully considered as part of the application.	The development of measures to avoid, reduce or compensate for any significant adverse effects of a Project is an intrinsic part of the Option Appraisals process and, from the outset, the route selection process described in ES Chapter 3: Alternatives (document reference 6.3). Where a statutory consultee raises issues, National Grid are committed to mitigating any significant risks associated with EMF from our assets.
2.11.16	The diagram below shows a basic decision tree for dealing with EMFs from overhead power lines.	This decision tree has formed the basis for the assessment of EMF from the Project, as demonstrated in the Electric and Magnetic Field Compliance Report (document reference 7.8).
	Sulphur Hexafluoride	
2.11.17	The Secretary of State should grant consent for an electricity networks development only if the applicant has demonstrated either: i. that the development will not use SF6; or ii. (a) that there is no proven commercially available alternative to the use of SF6; and	Sulphur Hexafluoride (SF6) is an '*insulating and arc-suppressant gas used in high-voltage switchgear for electricity networks. It is also an extraordinarily potent greenhouse gas, and fugitive emissions from electricity networks infrastructure are an object of increasing environmental concern, especially in light of the UK's commitment to net zero by 2050*'.

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	(b) that a bespoke SF6-free alternative would be grossly disproportionate in terms of cost; and (c) that emissions monitoring and control measures compliant with the F-gas Regulation and/or its successors are in place.	As outlined in ES Appendix 4.1: Greenhouse Gas Assessment (document reference 6.4.A1), it is assumed that no SF6 equipment will be used in the Project, in accordance with National Grid policy. SF6 alternatives such as C4 or G3 have a 99% lower global warming potential (GWP) than SF6.
2.12	**Special assessment principles for offshore-onshore transmission**	
2.12.1	Details in this section are in addition to those set out in EN-3 on the network connections for offshore wind including different types of offshore transmission. These include EN-3 sections 2.8.24 – 2.8.33 and 2.8.49 – 2.8.56 on network connections, 2.8.66 -2.8.69 on micrositing and 2.8.80-2.8.82 on Offshore Wind Environmental Standards which include offshore transmission and should be considered together with the details below.	It is National Grid's case that NPS EN-3 is relevant insofar as it provides strong support for the delivery of renewable energy developments supported by the Project.
2.12.4	As identified in EN-1, it is important that the network planning for offshore transmission is much more closely co-ordinated with the planning and development of the onshore transmission network than previously. This includes all types of offshore transmission including interconnectors, multi-purpose interconnectors (MPIs) and subsea 'onshore' transmission or 'bootstraps' reinforcing the onshore transmission network. 32 Further details on the different types of offshore transmission are provided in the Glossary.	As reported in response to EN-1 Paragraph 3.3.74: National Grid has coordinated with other projects at the project development stage for the offshore element of the Project. As part of the Offshore Coordination Support Scheme (OCSS), National Grid formed a consortium with the promoters of RWE Five Estuaries and RWE North Falls to explore the feasibility of an offshore coordination between the two offshore windfarms and the Project. Throughout the OCSS process, National Grid maintained an ongoing review of the potential implications of re-purposing Sea Link as an offshore wind farm connection point. Given that the SoS decided not to grant further funding to the OCSS based on likely significant increased capital and constraint costs of coordination and an up to five year delay to the overall programme for RWE Five Estuaries and RWE North Falls, which would have a likely adverse impact on the Government's 2030 renewable energy deployment targets, a more detailed
2.12.5	The above offshore-onshore transmission co-ordination work is undertaken through a process of ongoing reform with the key outcomes including the Holistic Network Design and its subsequent follow up exercises for offshore-onshore transmission and subsequent strategic network planning exercises such as the Centralised Strategic Network Plan led by National Grid Electricity	

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	System 33 and/or the Future Systems (once established).	design and consenting strategy was not progressed. The timeline for these Projects to be delivered has limited the ability of the Project to coordinate offshore but it has nonetheless been considered. The Project is considered a CNP infrastructure Project in line with NPS EN-1, EN-3 and EN-5.
2.12.6	In addition, a more co-ordinated approach to designing offshore transmission is expected to be adopted compared with the previous standard approach of radial routes to shore. This applies to spatially close groups of offshore windfarms, subsea 'onshore' transmission or bootstraps, interconnectors and multi-purpose interconnectors.	
	Critical National Priority	
2.12.7	As highlighted in EN-1 government has concluded that there is a CNP for the provision of nationally significant low carbon infrastructure. This includes for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System. This includes infrastructure identified in the Holistic Network Design and subsequent strategic network design exercises, see Section 2.13 below.	The Project, as electricity transmission infrastructure constitutes Critical National Priority infrastructure. The Planning Statement (document reference 5.6) explains that the Project is Critical National Priority Infrastructure. Without reinforcement, the capacity of the existing network in East Anglia and the South East is insufficient to accommodate the connection of proposed new power sources connecting in the area. As such, the Project is considered to be a means of all of the following: • Connecting a new generating station or storage facility to the network • Reinforcing the network to accommodate such connections, and • Reinforcing the network to ensure that it is sufficiently resilient and capacious.
2.13	**Offshore-onshore transmission: Applicant assessment**	
	Consideration of strategic network design	
2.13.2	The HND and subsequent network design and planning exercises identify and establish the transmission capabilities needed, both onshore and offshore, to	As reported in response to EN-1 Paragraph 3.3.74: National Grid has coordinated with other projects at the project development stage for the offshore element of the Project. As

Paragraph No.	Policy Requirement	How the Project Meets the Policy
	support offshore wind developments. These include the onshore connection points for offshore transmission and potential future Multi-Purpose Interconnector opportunities. Government recognises the work undertaken in the HND; the HND and subsequent network design exercises are likely to contain information that is important and relevant in the consideration of applications for infrastructure resulting from those exercises.	part of the Offshore Coordination Support Scheme (OCSS), National Grid formed a consortium with the promoters of RWE Five Estuaries and RWE North Falls to explore the feasibility of an offshore coordination between the two offshore windfarms and the Project. Throughout the OCSS process, National Grid maintained an ongoing review of the potential implications of re-purposing Sea Link as an offshore wind farm connection point. Given that the SoS decided not to grant further funding to the OCSS based on likely significant increased capital and constraint costs of coordination and an up to five year delay to the overall programme for RWE Five Estuaries and RWE North Falls, which would have a likely adverse impact on the Government's 2030 renewable energy deployment targets, a more detailed design and consenting strategy was not progressed. The timeline for these Projects to be delivered has limited the ability of the Project to coordinate offshore but it has nonetheless been considered.

Signposting for Compliance with EN-3 (Designated January 2024)

Table 1.3 Signposting for Compliance with EN-3

Paragraph No.	Policy Requirement	How the Project Meets the Policy
2.8.35	The previous standard approach to offshore-onshore connection involved a radial connection between single wind farm projects and the shore. A coordinated approach will involve the connection of multiple, spatially close, offshore wind farms and other offshore infrastructure, wherever possible, as relevant to onshore networks.	As reported in response to EN-1 Paragraph 3.3.74: National Grid has coordinated with other projects through the process of routing and siting and design development. This has included choosing a shared point of connection and exploring the concept of co-locating converter stations, sharing cable corridors and landfalls and also considering coordination in project delivery. National Grid has coordinated with other projects at the project development stage for the offshore element of the Project. As part of the Offshore Coordination Support Scheme (OCSS), National Grid formed a consortium with the promoters of RWE Five Estuaries and RWE North Falls to explore the feasibility of an offshore coordination between the two offshore windfarms and the Project. In April 2022 the Government announced the offshore Coordination Support Scheme (OCSS). The OCSS provided grant funding to Projects, it was available to those that were further developed than those eligible for the HND, to explore potential coordination options for offshore transmission infrastructure. At that stage five Projects, including the North Falls and Five Estuaries offshore wind farms, Sea Link, Euro Link (now Lion Link) and Nautilus committed to exploring coordinated network designs. Applications to the OCSS closed on 28 February 2023 and a consortium of North Falls, Five Estuaries and Sea Link was successful in receiving grant funding. Notwithstanding the funding, ultimately the OCSS was not taken forward, following a government decision in September 2024.

Paragraph No.	Policy Requirement	How the Project Meets the Policy
		In March 2024 the ESO (now NESO) issued the East Anglia Network Study. National Grid welcomed the independent assessment which the ESO (now NESO) delivered, to consider the consequential infrastructure impacts should the government decide to take the OCSS forward. The ESO study took a fresh look at the drivers for network reinforcement in East Anglia, alongside the various considerations that need to be taken into account. This includes the requirement for National Grid to develop proposals that represent value for money to consumers, while being in line with current planning policy, environmental legislation and our licence obligations. As stated above, the government decided not to award any further funding as part of the OCSS.

Signposting for Compliance with National Planning Policy Framework (NPPF) (Amended February 2025)

Table 1.4 Signposting for Compliance with NPPF (February 2025)

Paragraph / Section No.	Policy Requirement	How the Project Accords with the Policy
Section 2	**Achieving sustainable development**	
Para. 7	The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection.	The Norwich to Tilbury Project is a proposal by National Grid to reinforce the high voltage power network in East Anglia. The reinforcement is needed because the existing transmission network, even with current upgrading, will not have sufficient capacity for the new renewable energy (a substantial proportion of which is generated by offshore wind) that is expected to connect to the network over the next ten years and beyond. Completion of the Project, together with other new reinforcements across the country will meet this future energy transmission demand both in East Anglia and across the UK. The Planning Statement (document reference 5.6) explains that the Project is Critical National Priority Infrastructure as defined in National Policy Statement EN-1. Without reinforcement, the capacity of the existing network in East Anglia and the Southeast is insufficient to accommodate the connection of proposed new power sources connecting in the area.
Para. 8	Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives): a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in	The Planning Statement (document reference 5.6) provides an assessment of the Project against the objectives to sustainable development. The Project is Critical National Priority Infrastructure as defined in National Policy Statement EN-1 and is essential to ensure the existing transmission network will have sufficient capacity for the new renewable energy (a substantial proportion of which is generated by offshore wind) that is expected to connect to the network over the next ten years and beyond.

Paragraph / Section No.	Policy Requirement	How the Project Accords with the Policy
	the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.	ES Chapter 15: Socio-Economics, Recreation and Tourism (document reference 6.15) details the likely significant effects of the Project on employment and business activity during construction, severance and sterilisation of land (in the context of its potential for future development during construction and operation, disruption to community facilities and tourism and recreational facilities. It concludes that with embedded mitigation and control management measures, there is considered to be no likely significant adverse socio-economic, recreation and tourism effects expected as a result of the Project. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) sets out the assessment of likely significant ecology and biodiversity effects that could result from the Project. The chapter concludes that no residual significant long-term effects are predicted on ecological and biodiversity receptors, as a result of the construction and operation of the Project. While there is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure Projects for which development consent is required, the Project has committed to achieve a minimum of 10% Biodiversity Net Gain (BNG) (though onsite and offsite BNG) and undertaken a BNG assessment (based on the statutory biodiversity metric) which is presented in the Biodiversity Net Gain Report (document reference 7.1).
Para. 11	Plans and decisions should apply a presumption in favour of sustainable development… For decision-taking this means: c) approving development proposals that accord with an up-to-date development plan without delay; or d) where there are no relevant development plan policies, or the policies which are most important for	Noted: The need for the Project is set out in the Strategic Options Backcheck and Review Report (document reference 7.17) and the Planning Statement (document reference 5.6). In deciding the Application in accordance with Section 104(3) of the Planning Act 2008 the SoS must be satisfied that '*the adverse impacts of the proposed development would outweigh its benefits*' (Section 104(7)). To determine this, a balance of

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	determining the application are out-of-date, granting permission unless: i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.	the Project's adverse impacts against its benefits must be carried out. The Planning Statement demonstrates that the Project is in accordance with NPSs EN-1, EN-3 and EN-5. There is also a presumption that the urgent need for CNP infrastructure, such as the Project, will '*in general outweigh any other residual impacts not being addressed by the application of the mitigation hierarchy*' (Paragraph 3.3.63 of EN-1. The Project will help meet the urgent need for CNP infrastructure to meet '*energy objectives, together with the national security, economic, commercial, and net zero benefits*'.
Para. 13	The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.	Noted. An assessment of how the policies have taken into account Neighbourhood Plan Policies along the route is set out in this Policy Compliance Document.
Section 3	**Plan-making**	
Section 4	**Decision Making**	
Para. 40	Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.	National Grid has actively engaged with all host planning authorities and other key stakeholders throughout the project development. Details of engagement with stakeholders, including the host local authorities are documented within each of the ES chapters (document references 6.6 to 6.17). The Consultation Report (document reference 5.1) provides a complete overview of the consultation and stakeholder

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		engagement activities on the Project and explains how National Grid has had regard to the statutory guidance about the pre-application procedure pursuant to Section 50 of the Planning Act 2008.
Para. 48	Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.	The Planning Act 2008 at section 104 (2) (3) states that where a national policy statement has effect, decisions must be made on DCO applications in accordance with any relevant national policy statement unless an exception applies. Consideration as to how the Project has had regard to local planning policy is set out in this Policy Compliance Document.
Section 6	**Building a strong, competitive economy**	
Para. 85	Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.	Noted. ES Chapter 15: Socio Economics, Recreation and Tourism (document reference 6.15) includes an assessment of the Project effects on socio economics, recreation and tourism that could arise from the construction and operation (including maintenance) of the Project. National Grid promotes the use of local supply and small/medium enterprises through main contractors by embedded targets within its framework contracts. National Grid will continue to work with relevant planning authorities and business leaders at a national, regional and local level to identify opportunities to invest in employment networks, including looking for opportunities to work with local businesses.
Para. 87	Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for: a) clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that	In addition to the need to decarbonise existing electricity supplies, a substantial increase (double by 2050) in the total electricity generated to enable decarbonisation across all sectors is needed. The Project is designed to support this increasing demand for electricity, as set out in The Strategic Options Backcheck and Review Report (document reference 7.17) and the Planning Statement (document reference 5.6).

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	are needed to support the growth of these industries (including data centres and grid connections);	
Section 8	**Promoting healthy and safe communities**	
Para. 105	Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.	Table 8.3 of the Outline PRoW Management Plan (document reference 7.6) identifies the Public Rights of Way which are to be temporarily closed and/or diverted or actively managed during the construction phase. The following number of PRoW will be subject to temporary diversion and diversion and / or management: During the construction phase, it will be necessary to manage and / or close 47 PRoW in Norfolk, 156 in Suffolk (including Dams Lane, Dury Lane, Eastlands Land and Furze Way), 148 in Essex of which 144 will be subject to temporary affects, two will be permanently stopped up with a short realignment to provide perpendicular crossings of a widened highway and two will be permanently stopped up with no diversion and 19 in Thurrock for a period between 1 day and the duration of the works. The effects on PRoW during construction will be short term and will be managed by National Grid through measures set out in the Outline PRoW Management Plan (document reference 7.6). Whilst PRoW diversions are required, these have been designed to minimise additional journey distances, re-join existing routes and improve route connectivity.
Section 9	**Promoting sustainable transport**	
Para. 115	In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;	Traffic generated by the Project is not expected to result in any significant adverse environmental effects with the implementation of appropriate mitigation measures, including the Outline CTMPs. It is also not expected that the Project will have a significant impact on the strategic or local highway networks in terms of their capacity and highway safety. Effects resulting from the diversion of a limited number of PRoWs

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	b) safe and suitable access to the site can be achieved for all users; c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code48; and d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.	during construction and operation, will be managed appropriately in accordance with the Outline PRoW Management Plan (document reference 7.6). Overall, the Project would not have an unacceptable impact on highway safety or result in severe residual cumulative impacts on the SRN or local road network. The Project also include measures in the Outline CTMP (document reference 7.3) to encourage sustainable transportation for the workforce, in a way which reduces both environmental and social impacts on the local area.
Para. 116	Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.	See response to Paragraph 115, above.
Para. 117	Within this context, applications for development should: a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use; b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;	See response to Paragraph 115, above.

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	c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards; d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.	
Section 12	**Achieving well-designed places**	
Para. 135	Planning policies and decisions should ensure that developments: a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public	The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. National Grid has also considered alternative design suggestions made in written representations, during consultation feedback from external stakeholders. The design considerations have taken place within the context of meeting National Grid's duty to be economical and efficient and also within the rigorous health and safety processes that National Grid has in place that govern how it designs and constructs its projects safely. Regard has also been had to the Horlock and Holford rules in respect to the siting of new transmission infrastructure and substations, as described in detail in the Planning Statement (document reference 5.6), Design and Access Statement (document reference 7.15) and Design Approach for Site Specific infrastructure (document reference 7.16). The Design Approach for Site Specific Infrastructure (DASSI) (document reference 7.16) relates to the details of the site specific infrastructure of the non-linear works included in the

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	space) and support local facilities and transport networks; and f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.	Project, such as the substations and CSE compounds. This document outlines the design principles that can be taken forward into the detailed design stage, sets out an approach to the design of site-specific infrastructure of non-linear works, and details those elements of the design which have some flexibility in their appearance. The Design and Access Statement (document reference 7.15) provides an overview of the relevant national and local policy and physical context within which the design proposals have evolved. It sets out the design principles applied by National Grid and summarises its approach to good design. The report sets out the proposals and how the design has evolved through public consultation with a focus on the overhead lines.
Para. 136	Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) considers the potential effects of the Project on biodiversity. The receptors include woodland areas. ES Appendix 13.6 Arboricultural Impact Assessment (document reference 6.13.A6) identifies trees which may be affected by the Project, and to provide information on their locations, quantity, and quality. The information on tree constraints informed the design development process and subsequent landscape and ecological management planning. ES Appendix 8.1: Habitat Report (document reference 6.8.A1) sets out baseline information on ancient woodland, veteran and ancient trees within and adjacent to the Order Limits. As a general principle, all land which is temporarily impacted by the Project will be reinstated where practicable to its pre-construction condition land use. The only exception to this will be restrictions on tree planting below the overhead line and directly on top of the underground cables. Species mixes will allow for low growing and shallow rooted tree/scrub species as an alternative in these locations. The Outline LEMP (document

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		reference 7.4) outlines the general principles for landscape and ecological reinstatement on the Project. Mitigation for the permanent loss of habitat would be delivered through the creation / enhancement of habitat associated with BNG for the Project. Within the Order Limits six areas of land (defined as Environmental Areas) are proposed around the Project's permanent assets, where there is sufficient space. To ensure the BNG target is reached, any additional creation / enhancement would be delivered outside of the Order Limits., An indicative landscape design has been created for these areas (Appendix D: Outline Landscape Proposals of the Outline LEMP (document reference 7.4)). The habitats to be created and/or enhanced in these areas (onsite mitigation) have been designed to provide landscape and visual mitigation while also offering ecological value.
Para. 137	Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should, where applicable, provide sufficient information to demonstrate how their proposals will meet the design expectations set out in local and national policy, and should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.	The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. National Grid has also considered alternative design suggestions made in written representations, during consultation feedback from external stakeholders. The design considerations have taken place within the context of meeting National Grid's duty to be economical and efficient and also within the rigorous health and safety processes that National Grid has in place that govern how it designs and constructs its projects safely. Regard has also been had to the Horlock and Holford rules in respect to the siting of new transmission infrastructure and substations, as described in the Planning Statement (document reference 5.6), Design and Access Statement (document reference 7.15) and Design Approach for Site Specific infrastructure (document reference 7.16).

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Section 13	**Protecting Green Belt Land**	
Para. 153	When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.	The Project includes works within the Metropolitan Green Belt. The works include an overhead line comprising standard and low height pylons, a new Tilbury North Substation and new CSE compounds. As outlined in Chapter 7 of the Planning Statement (document reference 5.6), National Grid considers that the proposed overhead line comprises an engineering operation and should therefore not be regarded as inappropriate development in the Green Belt. It is National Grid's position that the proposed Tilbury North Substation and CSE compounds may be considered to be inappropriate development in the Green Belt. The Planning Statement (document reference 5.6) sets out the very special circumstances to justify this development in the Green Belt.
Para. 155	The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where: a) The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan; b) There is a demonstrable unmet need for the type of development proposed; c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and d) Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.	Noted. See response to Paragraph 153, above. The Project is Critical National Priority Infrastructure as defined in National Policy Statement EN-1 and is essential to ensure the existing transmission network will have sufficient capacity for the new renewable energy that is expected to connect to the network over the next ten years and beyond. The NPS EN-1 Paragraph 4.2.16 sets out that where a project is CNP Infrastructure the Secretary of State will take as a starting point for decision making that that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. NPS EN-1 Paragraph 4.2.17 identifies that this assumption includes where development is within a Green Belt and requires very special circumstances to justify development.
Para. 159	The improvements to green spaces required as part of the Golden Rules should contribute positively to the	The Golden Rules are not relevant to infrastructure proposals. However, a number of Environmental Areas' have been

Paragraph / Section No.	Policy Requirement	How the Project Accords with the Policy
	landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan. Where no locally specific standards exist, development proposals should meet national standards relevant to the development (these include Natural England standards on accessible green space and urban greening factor and Green Flag criteria). Where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes.	identified for creation across the Project as part of on-site mitigation. Multifunctional areas were prioritised, providing mitigation or enhancements for different environmental aspects i.e. sites where landscape mitigation and biodiversity gains could be achieved together. National Grid would retain ownership of these Environmental Areas and therefore National Grid can commit to a 30-year habitat management and monitoring plan. The areas are identified in the Outline LEMP (document reference 7.4).
Para. 160	When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.	Noted. Whilst the Project is not a renewable energy project, Norwich to Tilbury is a vital part of the transition to net zero. Due to the growth in offshore wind generation, there has been a significant number of connections planned in the East Anglian. As such, the network requires significant reinforcement to provide the connections of more offshore wind on the east coast. Accordingly, it is considered that this need case provides the very special circumstances to justify development in the Green Belt.
Section 14	**Meeting the challenge of climate change, flooding and coastal change**	
Para. 161	The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.	Noted. As identified in national policy and the Government's energy strategy there is an urgent and critical need to bring forward low carbon infrastructure to meet targets for decarbonisation and net zero. The Project will contribute to the delivery of these policy aims, by improving the existing electricity transmission network to accommodate the connection of proposed new power sources in East Anglia.

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Para. 168	When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should: a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future; b) recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions; c) in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site.	Noted. As identified in national policy and the Government's energy strategy there is an urgent and critical need to bring forward low carbon infrastructure to meet targets for decarbonisation and net zero. The Project will contribute to the delivery of these policy aims, by improving the existing electricity transmission network to accommodate the connection of proposed new power sources in East Anglia. It is clear that there is a compelling case and established need for the Project and that it will deliver national economic, social and environmental benefits in line with the Government's clear objectives of delivering sustainable development.
Para. 174	Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test.	Noted. The Project has been designed to avoid areas of significant flood risk. With the exception of the Wenham Grove CSE Compound, the substations and other CSE compounds would be located in Flood Zone 1 - see the FRA (document reference 7.9) for further details. The remaining structures, including above ground structures such as pylons and below ground structures such as the underground cable, are designed to National Grid technical standards to be resilient to flooding.
Para. 181	When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this	The impact of climate change, including the risk of flooding, have been considered during the optioneering and design evolution process. ES Chapter 3: Alternatives (document reference 6.3) sets out how the Project has been designed to avoid areas of significant flood risk. With the exception of the Wenham Grove CSE Compound, the substations and CSE compounds would be located in Flood Zone 1 - see the FRA

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	assessment (and the sequential and exception tests, as applicable) it can be demonstrated that: a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location; b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment; c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate; d) any residual risk can be safely managed; and e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.	(document reference 7.9) for further details. The remaining structures, including above ground structures such as pylons and below ground structures such as the underground cable, are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. The permanent drainage design at the substations and the CSE compounds would be developed in liaison with the Lead Local Flood Authority (LLFA). Commitment W08 in the Outline CoCP (document reference 7.2) sets out that surface water runoff will be managed in accordance with the requirements and standards of the relevant LLFA. Surface water runoff will be captured using sustainable drainage techniques that will be designed to allow for climate change resilience and with consideration of exceedance flow routes.
Para. 182	Applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. These should provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity. Sustainable drainage systems provided as part of proposals for major development should: a) take account of advice from the Lead Local Flood Authority; b) have appropriate proposed minimum operational standards; and c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development.	See response to Paragraph 181, above.

Paragraph / Section No.	Policy Requirement	How the Project Accords with the Policy
Section 15	**Conserving and enhancing the natural environment**	
Para. 187	Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate; d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs; e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and	Landscape and visual effects are considered in ES Chapter 13: Landscape and Visual (document reference 6.13) and ES Appendix 13.5: National Landscape Assessment Study, Annex A: Dedham Vale National Landscape Setting Study (document reference 6.13.A5). ES Chapter 8: Ecology and Biodiversity (document reference 6.8) presents the assessment of the likely significant ecology and biodiversity effects that could result from the Suffolk Onshore Scheme. The chapter concludes that no residual significant adverse effects are predicted as a result of the construction and operation of the Project. An Arboricultural Impact Assessment has been prepared in accordance with British Standard 5837:2012 Trees in Relation to Design, Demolition and Construction (ES Appendix 13.6, document reference 6.13.A6). This has identified trees that offer significant amenity value, such as veteran trees, which the Project has sought to avoid, where practicable. In addition, an Ancient Woodland and Veteran Tree Strategy (Appendix E of the Outline LEMP (document reference 7.4)) has been produced to detail the environmental measures that will be implemented to avoid, minimise, mitigate and compensate the ancient and / or veteran features likely to be impacted during construction and operation. Commitments have been put in place to reduce potential effects on veteran trees. Through careful routeing and siting the Project avoids all direct impacts on Sites of Special Scientific Interest. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) identifies and considers the impact of the Project on SSSIs. Following the application of mitigation set out in the Outline CoCP (document reference 7.2) it is concluded that there would be

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	f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.	no significant residual effect on Flordon Common SSSI. No potential for adverse effects on other SSSIs are expected. A Habitats Regulations Assessment Report (document reference 5.3) has been prepared and concludes that the Project does not result in any HRA residual impacts. National Grid has embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project. Embedded measures are those that are intrinsic to and built into the design of the Project, which have been presented in Table 4.2 in ES Chapter 4: Project Description (document reference 6.4). Those relevant to Ecology and Biodiversity include: • The Project has committed to deliver at least 10% BNG. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1). There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required. • The design would allow for landscape planting around CSE compounds, and the new EACN Substation, around the new Tilbury North (two options have been devised, one in the event that the Lower Thames Crossing Project is constructed, and the other if it is not)) and around the existing Norwich Main Substation • Mitigation areas for landscape planting (and BNG) around permanent features are labelled 'Environmental Areas' and are presented on ES Figure 4.1: Proposed Project Design (document reference 6.4.F1) and ES Figure 4.2: Proposed Project Design - Permanent Features (document reference

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		6.4.F2). Landscape planting would reduce effects – further details are provided in the Outline LEMP (document reference 7.4)
Para. 189	Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.	Landscape and visual effects are considered in ES Chapter 13: Landscape and Visual (document reference 6.13) and ES Appendix 13.5: National Landscape Assessment Study, Annex A: Dedham Vale National Landscape Setting Study (document reference 6.13.A5). ES Appendix 13.5: National Landscape Assessment Study (document reference 6.13.A5) describes the effects of the Project on Dedham Vale National Landscape during construction and operation. The Project would be undergrounded through Dedham Vale National Landscape and adjacent landscapes. A CSE compound would be located to the east of Raydon Great Wood, approximately 2 km to the north-east of the National Landscape at its closest point. The Project would then transition back to overhead line, heading north away from the National Landscape. To the south-east of Dedham Vale National Landscape, the underground cable route would continue outside the National Landscape and terminate at a new substation known as the EACN Substation, approximately 1.3 km south of the National Landscape. The Project would run on overhead line between the EACN Substation and Great Horkesley to the west. A further section of undergrounding is proposed to the south-west of the National Landscape at Great Horkesley, where the Project is within the setting of the National Landscape (see Annex B). The CSE compounds are located approximately 1.3 km to the south of the National Landscape at both ends of this underground section. The Project would then transition back to overhead line, before heading south away from the National Landscape.

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		National Grid's report, National Landscapes: Duty to Seek to Further the Purposes Report (s85 of Countryside and Rights of Way Act 2000) (document reference 5.10) sets out the current status of National Grid's consideration of its duty, in relation to the Project, to seek to further the purpose of the National Landscape, which is to 'conserve and enhance natural beauty' in accordance with section 85 of the Countryside and Rights of Way Act 2000 (CRoW Act) (as amended by section 245 LURA 2023). The design of the Project has considered the Protected Landscapes and sought to avoid harm and identify whether measures can be embedded in the design in accordance with Defra guidance when seeking to contribute and further the purpose of the designation. In addition to taking the National Landscape into consideration through all stages of the Project design as explained above, in line with the Defra guidance (Defra, 2024) additional 'appropriate, reasonable and proportionate steps' are under consideration in respect of the duty to seek to further the statutory purposes of the National Landscape. This is ongoing and being progressed in consultation with the DVNL Partnership Team and key stakeholders.
Para. 190	When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of: a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;	The need for the development is set out in the Planning Statement (document reference 5.6): the Project is Critical National Priority Infrastructure. The NPS EN-1 Paragraph 4.2.16 sets out that where a project is CNP Infrastructure the Secretary of State will take as a starting point for decision making that that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. ES Appendix 13.5: National Landscape Assessment Study (document reference 6.13.A5) describes the effects of the

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	b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.	Project on Dedham Vale National Landscape during construction and operation. The Project would be undergrounded through the Dedham Vale National Landscape and adjacent landscapes.
Para. 193	When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest; c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and	Through careful routeing and siting the Project avoids all direct impacts on Sites of Special Scientific Interest. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) identifies and considers the impact of the Project on SSSIs. Following the application of mitigation set out in the Outline CoCP (document reference 7.2) it is concluded that there would be no significant residual effect on Flordon Common SSSI. No potential for adverse effects on other SSSIs are expected. A Habitats Regulations Assessment Report (document reference 5.3) has been prepared. The Project does not result in any HRA or MCZ residual impacts. An Arboricultural Impact Assessment has been prepared in accordance with British Standard 5837:2012 Trees in Relation to Design, Demolition and Construction (ES Appendix 13.6, document reference 6.13.A6). This has identified trees that offer significant amenity value, such as veteran trees, which the Project has sought to avoid, where practicable. In addition, an Ancient Woodland and Veteran Tree Strategy (Appendix E of the Outline LEMP (document reference 7.4)) has been produced to detail the environmental measures that will be implemented to avoid, minimise, mitigate and compensate the ancient and / or veteran features likely to be impacted during construction and operation. Commitments have been put in place to reduce potential effects on veteran trees.

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	d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.	Chapter 7 of the Outline LEMP (document reference 7.4) sets out specific measures and commitments in relation to ancient woodland and veteran trees. Mitigation for the permanent loss of habitat would be delivered through the creation / enhancement of habitat associated with BNG for the Project. Within the Order Limits six areas of land (defined as Environmental Areas) are proposed around the Project's permanent assets, where there is sufficient space. To ensure the BNG target is reached, any additional creation / enhancement would be delivered outside of the Order Limits.
Para. 194	The following should be given the same protection as habitats sites: a) potential Special Protection Areas and possible Special Areas of Conservation; b) listed or proposed Ramsar sites; and c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) details the likely significant effects of the Project with respect to biodiversity, including: internationally, nationally and locally designated sites; protected species and habitats; and other species identified as being of principal importance for the conservation of biodiversity. The chapter concludes that no residual significant adverse effects are predicted as a result of the construction and operation of the Project. To support the Secretary of State within its duties under the Conservation of Habitats and Species Regulations 2017 (as amended) and in accordance with planning policy, Habitats Regulations Assessment Report (document reference 5.3) presents the HRA undertaken for the Project, which comprises Stage 1: Screening and Stage 2: Appropriate Assessment. It builds on the Draft HRA Screening Report and has concluded that there will be not significant adverse effects of the integrity of a European Site (following the implementation of mitigation). The Appropriate Assessment concluded there would be no significant adverse effects on the integrity of the Norfolk Valley Fens SAC and the Stour and Orwell Estuaries SPA and Ramsar Site with regard to hydrology once mitigation measures identified in the Outline CoCP (document reference 7.2) are employed.

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Para. 195	The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.	A Habitats Regulations Assessment Report (document reference 5.3) has been prepared. The Report concludes that the Project does not result in any HRA residual impacts.
Para. 196	Planning policies and decisions should ensure that: a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation); b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.	ES Appendix 9.1: Baseline Information and Preliminary Contamination Risk Assessment (document reference 6.9.A1) describes the known areas where a risk of contamination has been identified. This notes that the majority of the Order Limits and Study Area appears to have remained as “undeveloped” agricultural land and farm buildings since the earliest historical mapping reviewed, dating from the 1880s. In these areas it is considered that there is a very low risk of potential sources of significant existing contamination and therefore they are not considered further. There are discrete areas within the Study Area that have a history of potentially contaminative land use or where the current land use is potentially contaminative. Where these areas are identified, readily available information relating to the Potential Sources of Contamination (PSC) has been gathered and a preliminary contamination risk assessment has been carried for each potential contamination source. The Outline CoCP (document reference 7.2) sets out the measures that would be taken to deal with unexpected contamination identified during construction.
Para. 198	Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the	ES Appendix 9.1: Baseline Information and Preliminary Contamination Risk Assessment (document reference 6.9.A1) describes the known areas where a risk of contamination has been identified. This notes that the majority of the Order Limits and Study Area appears to have remained as “undeveloped”

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	potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life; b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.	agricultural land and farm buildings since the earliest historical mapping reviewed, dating from the 1880s. In these areas it is considered that there is a very low risk of potential sources of significant existing contamination and therefore they are not considered further. There are discrete areas within the Study Area that have a history of potentially contaminative land use or where the current land use is potentially contaminative. Where these areas are identified, readily available information relating to the Potential Sources of Contamination (PSC) has been gathered and a preliminary contamination risk assessment has been carried for each potential contamination source. The Outline CoCP (document reference 7.2) sets out the measures that would be taken to deal with unexpected contamination identified during construction. ES Chapter 14: Noise and Vibration (document reference 6.14) details the likely significant effects associated with construction noise and vibration, construction traffic noise, operational noise from the proposed EACN Substation and Tilbury North Substation and operational vibration. Operational traffic noise and operational noise from overhead lines and underground cables have not been assessed due to the likely low level noise generation from these aspects of the Project. The assessment indicates that potential significant adverse effects can be avoided through the use of standard mitigation in the form of Best Practice Measures (BPM). The magnitude of impact of construction noise is expected to be negligible to small at all nearby residential and low to medium sensitivity non-residential noise sensitive receptors, and negligible at all nearby high-sensitivity noise sensitive receptors. The assessment also concluded that with appropriate mitigation measures, the effects of construction noise during weekend and bank-holiday periods would not be significant.

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Para. 199	Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.	ES Chapter 7: Air Quality (document reference 6.7) provides an assessment of the likely effects on air quality that could result from the construction of the Project and consider the existing baseline conditions and the likely changes and effects to air quality levels during construction. The assessment of potential impacts on water quality arising from the Project is assessed in ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12). The assessment of Air Quality and Water Quality concludes that with the adoption of the good practice measures identified in the Outline CoCP (document reference 7.2) there are no likely significant residual effects.
Section 16	**Conserving and enhancing the historic environment**	
Para. 207	In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require	ES Chapter 11: Historic Environment (document reference 6.11) presents the assessment of the Project on heritage assets. This has been supplemented by field evaluation, including geophysical survey and trial trenching. Details of these can be found in ES Chapter 11: Historic Environment (document reference 6.11), ES Appendix 11.4: Geophysical Survey Results Report (document reference 6.11.A4) and ES Appendix 11.5: Trial Trenching Results Report (document reference 6.11.A5). The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on cultural heritage and archaeology assets. However, due to the statutory tests outlined in the Infrastructure Planning (Decisions) Regulations 2010 (H. M. Government, 2010), the SoS, when making a decision, is duty-bound to have regard to whether a scheme

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	developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.	preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty. Given that the Assessment of Harm to Designated Assets presented in Assessment of Harm to Designated Heritage Assets (document reference 6.11.A7). demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this loss of significance is necessary and justified to achieve the substantial public benefit of delivering the Project.
Para. 212	When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.	In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse residual effects on cultural heritage and archaeological assets. ES Chapter 11: Historic Environment (document reference 6.11) concludes that the Project would not result in substantial harm to any designated historic assets. The less than substantial harm upon non designated heritage assets affected by the Project is also clearly outweighed by the substantial public benefits and need for the Project.
Para. 213	Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed	In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse residual effects on cultural heritage and archaeological assets. ES Chapter 11: Historic Environment (document reference 6.11) concludes that the Project would not result in substantial harm to any designated historic assets. The less than substantial harm resulting to non-designated heritage assets affected by the Project is also clearly outweighed by the substantial public benefits and need for the Project.

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	buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.	
Para. 214	Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a) the nature of the heritage asset prevents all reasonable uses of the site; and b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use.	ES Chapter 11: Historic Environment (document reference 6.11) concludes that the Project would not result in substantial harm to any designated historic assets.
Para. 215	Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.	ES Appendix 11.7 (document reference 6.11.A7) concludes that none of the harm is of so considerable a scale as to be classified as substantial harm. It is considered that the lower less than substantial harm and mid less than substantial harm reported in Appendix 11.7 (document reference 6.11.A7) does equate to a loss of significance to heritage assets. The substantial public benefits and need for the Project contributes towards meeting national energy security objectives, clearly and demonstrably outweigh the less than substantial harm, at the medium and lower end of the spectrum, to the designated heritage assets. The potential for

Paragraph / Section No.	Policy Requirement	How the Project Accords with the Policy
		harm or loss of significance upon non- designated heritage assets affected by the Project is also clearly outweighed by the substantial public benefits and need for the Project providing the judgement required under paragraph 5.9.33 of NPS EN-1
Para. 216	The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.	The less than substantial harm upon non-designated heritage assets affected by the Project is clearly outweighed by the substantial public benefits and need for the Project.
Para. 219	Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.	Noted. However, the Project does not propose any new development in or adjacent to Conservation Areas or World Heritage Sites.

Signposting for how the Project has had regard to Local Planning Policy

Table 1.5 Table containing policy wording of relevant local plan policy.

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning the Policy
Norfolk County Council Core Strategy and Minerals and Waste Development Management Policies Development Plan Document (2011)		
CS16 – Safeguarding mineral and waste sites and mineral resources	"The County Council will safeguard existing, permitted and allocated mineral extraction and associated development and waste management facilities, within the following categories: • Waste management facilities with a permitted input of over 20,000 tonnes per annum; • Key wastewater and sludge treatment facilities (listed in the Waste Site Specific Allocations DPD); • Waste water pumping stations; • All mineral extraction sites that are active, and sites with planning permission and allocated sites; and • Infrastructure located at railheads, wharves and quarries which can transport or handle minerals. The County Council will oppose development proposals which would prevent or prejudice the use of safeguarded sites for those purposes unless suitable alternative provision is made".	The Project has sought to avoid direct interactions with existing minerals sites, where possible, as described within ES Appendix 9.2: Qualitative Minerals Resource and Infrastructure Assessment (document reference 6.9.A2). The Order Limits of the Project interact with one Adopted Site MIN81 based on the information provided by Norfolk County Council and the recently adopted Norfolk County Minerals and Waste Local Plan (adopted in May 2025). Further details can be found in ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9). The ES chapter concludes that discussions with the existing minerals operators are ongoing and where appropriate, subject to Statements of Common Ground to agree appropriate mitigation for any potential impacts on these sites.
DM1 – Nature conservation	"Development that would harm: • Locally designated nature conservation and geodiversity sites; and/or • Habitats, species or features identified in UK and Norfolk biodiversity and geodiversity action plans; will only be permitted if it can be demonstrated that sufficient measures to mitigate harm to the site,	ES Chapter 8: Biodiversity (document reference 6.8) presents the assessment of the likely significant ecology and biodiversity effects that could result from the Project. The chapter concludes there will be some temporary impact associated with the construction phase to both statutory designated sites and non-statutory designed sites. These temporary impacts will be mitigated through the standard mitigation measures set out in Outline CoCP (document

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning the Policy
	habitat(s) and/or species can be put in place, preferably in advance of development. If appropriate mitigation measures cannot practicably be implemented, compensatory habits or geological exposure of at least an equivalent standard at a suitable alternative location should be provided. Potential adverse impacts off-site, caused by water contamination, changes to hydrology and/or air pollution, will also need to be considered. In cases where permission is granted on the basis that restoration will provide enhancement to local nature conservation efforts in the longer-term, any adverse impacts on local nature conservation during the construction and operational phases must be mitigated and fully compensated for. Ongoing management of the restored areas and compensatory habitat(s) will be required to prevent succession away from the chosen habitat(s) type unless this would be unnecessary or inappropriate".	reference 7.2) which will minimise potential significant effects associated with dust, noise and hydrological effects on most statutory designated sites within the study area. The CoCP measures will be secured by requirement 4 in Schedule3 of the draft Development Consent Order (document reference 3.1). Where the construction phase results in temporary habitat damage or loss the habitat will be reinstated post-construction ensuring there would be no long-term adverse impact. Some of the woodland habitats cannot be replaced due to safety clearances requirements and therefore, mitigation in the form of compensation planting is proposed. The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, during the construction and operation (including maintenance) phases. In addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation with environmental and societal benefits. This is reported in the Biodiversity Net Gain Report (document reference 7.1). There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required. On-site planting will be delivered through planting around the new Tilbury North Substation (if the Lower Thames Crossing project is not constructed) and

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning the Policy
		around the existing Norwich Main Substation and the delivery of Environmental Areas, as well as Environmental Areas around new permanent infrastructure elsewhere along the route. The Outline Landscape and Ecological Management Plan (LEMP) (document reference 7.4)) as secured by Requirement 9 in Schedule 3 of the DCO (document reference 3.1) sets out the landscape strategy. The Habitats Regulations Assessment Report (HRA) (document reference 5.3) presents the HRA undertaken for the Project, which comprises Stage 1: Screening and Stage 2: Appropriate Assessment. It builds on the Draft HRA Screening Report and has concluded that there will be not significant adverse effects of the integrity of a European Site (following the implementation of mitigation). The HRA Appropriate Assessment concluded there would be no significant adverse effects on the integrity of the Norfolk Valley Fens SAC and the Stour and Orwell Estuaries SPA and Ramsar Site with regard to hydrology once mitigation measures identified in the Outline CoCP (document reference 7.2) are employed. This includes direct and indirect (through FLL) effects at the Stour and Orwell Estuaries SPA and Ramsar Site.
Policy DM 8 – Design, local landscape and townscape character	"Development will be permitted if it will not harm the conservation of, or prevent the enhancement of, key characteristics of its surroundings with regard to the character of the landscape and townscape, including consideration of its historic character and settlement pattern, taking into account any appropriate mitigation measures. In line with PPS1, new development, including ancillary landscaping and car parking areas, must promote good design which is compatible with the existing or planned	National Grid has included embedded measures (discussed in ES Chapter 13 Landscape and Visual (document reference 6.13)) into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project through consideration of route corridors and the application of design principles as set out in the Design and Access Statement (document reference 7.15) and ES Chapter 3: Alternatives (document reference 6.3).

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning the Policy
	built form of the local area and the surrounding landscape. Applicants will be expected to show how their proposals will address impacts on landscape and townscape. This would normally be undertaken through a study and evaluation of local landscape and townscape character and an assessment of how the proposal will impact on it, with reference to any relevant landscape character assessment or design guide. Alternatively it could be carried out through a local assessment using a suitable methodology, appropriate to the scale of the development proposed. In particular the potential individual and cumulative effects on the following issues must be addressed: • landscape and townscape character, e.g. visual intrusion, the layout and scale of buildings and designated spaces, the built fabric, public access; and • landscape and townscape sensitivity and capacity, e.g. local distinctiveness, condition, historic patterns of development, semi-natural habitats, remoteness and tranquillity, and noise and light pollution. Development will only be permitted where it would be within, or could affect the setting of, nationally or locally registered Historic Parks or Gardens, registered battlefields, conservation areas, listed buildings or the North Norfolk Heritage Coast, where the applicant can demonstrate that the development would not adversely impact on the historic form, character and/or setting of these locations, taking into account any mitigation measures".	The full assessment of the potential residual effects of the Project on landscape and visual amenity is set out in ES Chapter 13: Landscape and Visual (document reference 6.13) and ES Appendix 13.2: Landscape Baseline and Assessment (document reference 6.13.A2), ES Appendix 13.3: Visual Baseline and Assessment (document reference 6.13.A3) and ES Appendix 13.4: Residential Visual Amenity Assessment (document reference 6.13.A4). The landscape and visual amenity assessments indicate that the construction phases would result in significant negative landscape and visual amenity effects. These significant effects are related to the introduction of construction activity and equipment, including the loss of some landscape features including farmland and field boundary vegetation. At Year 15 of operation, these effects would reduce due to maturing of the reinstatement planting which would integrate the areas previously used for construction, and the maturing of the Environmental Area proposed around Norwich Substation which sits within Norfolk County. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure projects, as set out in Paragraphs 5.10.5 and 5.10.13 of NPS EN-1.ES Chapter 11 Historic Environment (document reference 6.11) assesses the likely significant historic environment effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and

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		archaeological assets. The ES Chapter notes that the Historic Environment Baseline Report has established that there would be no impact on the setting of the majority of the heritage assets in Norfolk County (referred to in Section A in ES Chapter 11). The substantial public benefits and need for the Project, as set out in Chapter 5 of the Planning Statement (document reference 5.6), including supporting the UK's net zero target, enabling the connection in East Anglia of new low carbon energy generation, and reinforcing the transmission network are considered to clearly and demonstrably outweigh the harm to designated heritage assets and the non-designated heritage assets, including their setting, of scheduled quality.
Development Management Policy DM13 – Air quality	"Applicants for planning permission will be required to submit information to demonstrate that proposals effectively minimise harmful emissions to air and would not impact negatively on existing Air Quality Management Areas, nor lead to the declaration of a new AQMA. Development will be permitted if adequate measures can be agreed through planning conditions to mitigate potentially harmful air quality impacts to human health. Planning permission will only be granted in areas nearing AQMA threshold limits if an Air Quality Impact Assessment shows that the development in question and its associated activities would not increase air pollution to unacceptable levels, as defined in the National Air Quality Strategy".	The Project's effects on air and dust are considered in ES Chapter 7: Air Quality (document reference 6.7) which assesses the likely air quality effects that would result from the Project and considers the existing baseline conditions and the likely changes and effects to air quality levels during the construction phase. The Project does not interact with any Air Quality Management Areas in South Norfolk Council. The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. An assessment of construction dust impacts on local amenity and ecological sites is also provided as detailed in the Air Quality Assessment Methodology (document reference 6.7.A1) and the Air Quality Assessment Results (documents reference 6.7.A3). The assessment confirms that with the implementation of the proposed standard mitigation measures, the effects of

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		construction on air quality in regard to dust soiling, and human health effects are anticipated to be not significant. As set out in the Scoping Report (document reference 6.19) and agreed within the Scoping Opinion (document reference 6.20), the operational phase of the Project will not result in any significant impacts to air quality and no further assessment has been carried out in the ES.
Greater Norwich Local Plan 2024 (South Norfolk)		
P2 – Sustainable Communities	"To contribute to the achievement of sustainable communities, development proposals should, where relevant, address the following matters … 3. Create and contribute to multi-functional green infrastructure links, whether provided on-site or off-site, including through landscaping, street trees and other tree planting, taking account of local green infrastructure strategies and delivery plans. 4. Make efficient use of land with development densities taking account of accessibility and local character consideration. For residential development, it is expected that there will be minimum net densities of 40 dwellings per hectare in Norwich and 25 dwellings per hectare elsewhere in the Plan area. Higher densities are encouraged in and close to defined district and town centres, and in particular in the city centre. In the most accessible locations in Norwich, regard should be given to providing low or car-free housing in accordance with Policy DM32 of the Norwich Development Management Policies Local Plan. 5. Create beautiful, well-designed places and buildings which respect the character of the local area and seek to enhance it through appropriate design, having	The Project's compliance with the relevant criteria (criterion 3, 4, 5, 7, 8, 9 and 10) is set out below. (3) With regard to strategic green infrastructure a landscape strategy has been prepared for the Environmental Area at Norwich Substation which provides a collaborative approach to delivering landscape and biodiversity mitigation (Landscape and Ecological Management Plan (document reference 7.4)) as secured by Schedule 3 of the DCO (document reference 3.1). This landscape strategy has been developed in recognition of the local landscape policies and landscape character, considering the opportunities for local landscape and biodiversity enhancements. It has been developed as part of the iterative process of design and assessment. (4 and 5) The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. The Design Development Report (document reference 5.15) provides an explanation of the main changes in the route alignment and technology following the review and consideration of feedback received to the 2024 statutory consultation and to the targeted statutory and non-statutory consultations held in 2025. A Design and Access Statement

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	regard to any local design guidance (including design codes)… 7. Avoid risks of unacceptable levels of soil, air, water and noise pollution and/or land instability. 8. Avoid locating inappropriate development in areas at risk of flooding by applying the sequential and exceptions tests and ensuring that flood risk is not increased elsewhere. Sustainable drainage systems should be incorporated unless there is clear evidence that this would be inappropriate. 9. Ensure a high level of water efficiency. To achieve this: i. Housing development will meet the Building Regulations part G (amended 2016) water efficiency higher optional standard, or any equivalent successor; ii. Non-housing development will meet the BREEAM "Very Good" water efficiency standard, or any equivalent successor. 10. Protect water quality and ensure a low level of energy consumption. To achieve this development proposals should: i. Take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption and the risk of overheating… To assist this broad-based approach: (i) Planning applications for major developments will be required to be accompanied by a Sustainability Statement (including Health Impact Assessments as appropriate) showing how development will address the above matters that are relevant to the proposal. Housing development should take account of the	(document reference 7.16) has also been produced and sets out a summary of National Grid's approach to good design and demonstrates how National Grid has responded to the physical, environmental and socio-economic context of the overhead line route and cable end sealing compound and substation locations and responded to consultation to define the Project. (7) The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce adverse environmental impacts through the process of design development, and by embedding measures into the design of the Project. With regards to Air Quality the assessment presented in ES Chapter 7: Air Quality (document reference 6.7) concludes that with the implementation of the proposed standard mitigation measures, the effects of construction on air quality in regard to dust soiling, and human health effects are anticipated to be not significant. The Outline CoCP (document reference 7.2) sets out the mitigation measures that will be put in place to minimise impacts to amenity of neighbouring uses with regards to managing impacts on air quality from construction. As set out in the Scoping Report (document reference 6.19) and agreed within the Scoping Opinion (document reference 6.20), the operational phase of the Project will not result in any significant impacts to air quality and no further assessment has been carried out in the ES. (8) The Flood Risk Assessment (FRA) (document reference 7.9) has been submitted as part of the application for development consent to assess how the Project impacts and risks from flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document

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	National Design Guide (and any subsequent related publications) and optionally making use of tools such as Building for a Healthy Life (or any successor). Flood risk assessments will be provided separately in accordance with the NPPF…"	reference 6.12) concludes that the parts of the Project which are located in South Norfolk (Section A of the Project route) are mostly located in Flood Zone 1. A sequential approach has been taken in siting the Project. Detail on the Sequential and Exception Test are provided in Sections 5.1 and 5.2 of the FRA (document reference 7.9) submitted as part of the application for development consent. The Project is classified as 'essential infrastructure' with respect to flooding vulnerability in the NPPF. The substations and CSE compounds, which represent the parts of the Project that are most vulnerable to flooding, are situated in Flood Zone 1, satisfying the Sequential Test. Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures. These measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk. Surface water impacts are assessed in ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12). The majority of the permanent Project infrastructure would be located outside of the areas shown to be at 'high' risk of surface water flooding in the Environment Agency Surface Water Map. Of the places where the Project interacts with the high-risk zone for operation, the majority of these are access roads. Surface water runoff from construction sites, haul roads and operational assets would be managed using SuDS techniques appropriate to local conditions (see Appendix C of the FRA (document reference 7.9)) and through standard mitigation measures set out in the Outline CoCP (document reference 7.2).

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		The Outline CoCP (document reference 7.2) describes the good practice measures including SuDS for managing surface water flood risk that would be adopted. Good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDs that are maintained for the Project's lifetime. The FRA (document reference 7.9) states that access roads and haul roads, as well as areas where impermeable material will be installed in areas where heavy equipment would be used, will also have suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff appropriate to local conditions. Annex C of the FRA (document reference 7.9) contains further details on SuDs. (9) Water efficiency is considered in the Outline CoCP (document reference 7.2). Commitment W16 sets out the water supply and efficiency commitments which will be adopted during construction. (10) The impact of the Project on water quality is assessed in ES Chapter 12: Hydrology and Land Drainage (document reference 6.12) found that the proposed construction activities could have an impact on water quality. The standard mitigation measures within the Outline CoCP (document reference 7.2) would reduce pollution risks and the potential negative effects of the temporary watercourse crossings such that a negligible effect is assessed on the water quality attributes of watercourses (assigned a value of high to medium). This results in a negligible significance of effect, which is not significant.
P3 – Environmental	"The Built and Historic Environment The development strategy of the plan and the sites proposed for development reflect the area's settlement	In relation to the built and historic environment, ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the likely significant historic environment

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Protection and Enhancement	structure of the city, towns and villages, retaining the separate identities of individual settlements. Development proposals should enhance the built and historic environment through… • Avoiding harm to designated and non-designated heritage assets, including their setting, having regard to their level of significance in accordance with the requirements of the NPPF and relevant policies in other Development Plan Documents and Neighbourhood Plans… • Undertaking a heritage impact assessment if significant impacts to a heritage asset might arise… • Where relevant, heritage interpretation measures should be provided to enhance the appreciation and understanding of local heritage assets. The Natural Environment Development proposals should enhance the natural environment through: • Being designed to respect, conserve and enhance natural assets, taking account of local design and other guidance such as landscape character assessment; • Avoiding harm to designated and non-designated assets of the natural environment, having regard to their level of significance (local, national, and international) in accordance with the requirements of the NPPF and relevant policies in other Development Plan Documents and Neighbourhood Plans. • Following a hierarchy of seeking firstly to avoid impacts, mitigate for impacts so as to make them insignificant for biodiversity, or as a last resort compensate for losses that cannot be avoided or	effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets (document reference 6.11.A7) found that the Project would not result in substantial harm to any heritage assets. Chapter 11: Historic Environment (document reference 6.11) concludes that within South Norfolk Council the project would result in a medium adverse magnitude of impact resulting in a permanent moderate adverse significance of effect (significant) to 2 designated assets and 8 non-designated assets due to changes in their setting but this impact would be at the lower end of the spectrum of less than substantial harm. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. The substantial public benefits and need for the Project, as set out in Chapter 5 of the Planning Statement (document reference 5.6), including supporting the UK's net zero target, enabling the connection in East Anglia of new low carbon energy generation, and reinforcing the transmission network clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage assets of scheduled quality. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1

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	mitigated for. Adherence to the hierarchy should be demonstrated. • Undertaking a relevant assessment (such as a landscape or ecological assessment) if impacts to a natural asset might arise. • Provision of new, or conservation or enhancement of existing, green infrastructure to contribute (directly or indirectly) to the strategic green infrastructure network having regard to local green infrastructure strategies (identified indicatively in Maps 8A and 8B). • Respecting landscape character and retaining important views and features, having regard to landscape character assessments and sensitive areas such as landscape settings, strategic gaps and green spaces identified in Local or Neighbourhood Plans, and to the importance of the nationally designated Broads Authority area and its setting. In applying the above, regard will be given to the level of importance of the natural asset. In addition, development will deliver net biodiversity gain through the provision of on-site or off-site natural features, creating new or enhancing existing green infrastructure 74 networks that have regard to local green infrastructure strategies. It should be demonstrated that the gain to biodiversity is a significant enhancement (at least a 10% gain) compared to the existing situation. Any development that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment under the Habitat Regulations at application stage. If it cannot be ascertained that there would be no adverse effects on site integrity the	(DESNZ, 2024) which sets out that the Secretary of State will take as a starting point for decision making that that CNP infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. In relation to natural environment part of this policy, ES Chapter 13: Landscape and Visual (document reference 6.13) highlights the baseline condition (Section 13.5) for landscape character and visual referring to the sections of the Project that they are located. The chapter considers likely effects on landscape character and on experiences of views seen from designated landscapes, settlements / communities, and routes. Landscape proposals have responded to the design of the Project throughout its development. Therefore, the embedded mitigation measures that have been incorporated within the design have addressed visual effects wherever possible. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) presents the assessment of the likely significant ecology and biodiversity effects that could result from the Project. The chapter concludes there will be some temporary impact associated with the construction phase to both statutory designated sites and non-statutory designed sites. These temporary impacts will be mitigated through the standard mitigation measures set out in the Outline Code of Construction Practice (CoCP) (document reference 7.2) which will remove potential significant effects associated with dust, noise and hydrological effects on most statutory designated sites within the Study Area. Where the construction phase results in temporary habitat damage or loss the habitat will be reinstated post-construction ensuring there would be no long-term adverse

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	application will be refused unless it passes the tests set out in Regulation 62, and any necessary compensatory measures will need to be secured...".	impact. Some of the woodland habitats cannot be replaced due to safety clearances and therefore, mitigation in the form of compensation planting is proposed. The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, during the construction and operation (including maintenance) phases. In addition, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1). There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required. With regard to strategic green infrastructure a landscape strategy has been prepared for the Environmental Areas at Norwich Main substation which provides a collaborative approach to delivering landscape and biodiversity mitigation (Outline Landscape and Ecological Management Plan (LEMP) (document reference 7.4)) as secured by Schedule 3 of the draft DCO (document reference 3.1). This landscape strategy has been developed in recognition of the local landscape policies and landscape character, considering the opportunities for local landscape and biodiversity enhancements. It has been developed as part of the iterative process of design and assessment.

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		The Habitats Regulations Assessment (HRA) Report (document reference 5.3) presents the HRA undertaken for the Project, which comprises Stage 1: Screening and Stage 2: Appropriate Assessment. It concludes the Project will not result in any adverse effects on the integrity of a European Site including the Norfolk Valley Fens SAC and the Stour and Orwell Estuaries SPA and Ramsar Site with regard to hydrology once mitigation measures identified in the Outline CoCP (document reference 7.2) are employed secured through Requirement 4 of the draft DCO (document reference 3.1) are implemented. This includes direct and indirect (through FLL) effects at the Stour and Orwell Estuaries SPA and Ramsar Site.
P4 – Strategic Infrastructure	"Other Strategic Infrastructure The Greater Norwich local authorities and partners including utility companies will work together in relation to the timely delivery of improvements to infrastructure, including that set out in appendix 1 and to: • The energy supply network including increased capacity at primary substations at Cringleford, Peachman Way, Sprowston and Earlham Grid Local and/or innovative smart solutions to offset the need for reinforcement. • Water supply and sewerage network improvements including the wastewater network at Whitlingham water recycling centre, the Yare Valley sewer and elsewhere to protect water quality and designated habitats. • Health care infrastructure. • Police infrastructure".	The Norwich to Tilbury Project is a proposal by National Grid to reinforce the high voltage power network in East Anglia. The reinforcement is needed because the existing transmission network, even with current upgrading, will not have sufficient capacity for the new renewable energy (a substantial proportion of which is generated by offshore wind) that is expected to connect to the network over the next ten years and beyond. Completion of the Project, together with other new reinforcements across the country will meet this future energy transmission demand both in East Anglia and across the UK. The Planning Statement (document reference 5.6) explains that the Project is Critical National Priority Infrastructure as defined in National Policy Statement EN-1. Without reinforcement, the capacity of the existing network in East Anglia and the South East is insufficient to accommodate the connection of proposed new power sources connecting in the area. As such, the Project is considered to be a means of all of the following:

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		• Connecting a new generating station or storage facility to the network • Reinforcing the network to accommodate such connections, and • Reinforcing the network to ensure that it is sufficiently resilient and capacious. National Grid have sought to consult with utility companies and nearby infrastructure projects whom the Project interacts with. Statements of Common Ground have been prepared to ensure timely delivery of utility projects and infrastructure projects can take place alongside this Project. Details around this are set out in ES Chapter 6.17: Cumulative Effects (document reference 6.17) and Draft Statement of Common Ground with Anglian Water (document reference 5.9.26) Essex and Suffolk Water (document reference 5.9.27), National Gas Transmission (document reference 5.9.29).
South Norfolk Development Management Policies Document (2015)		
DM 1.4 Environmental quality and local distinctiveness	a) "The Council will work with developers to promote and achieve high quality and positive environmental improvement from all development. All development proposals must demonstrate an understanding and evaluation of the important environmental assets including locally distinctive characteristics, and justify the design approach. b) Designated assets will be protected in accordance with their natural and historic significance, as detailed in the Development Management Policies. c) A net environmental improvement will always be sought and all proposals should avoid environmental harm or where this is not possible, adequately	The Project accords with this policy as set out below, where the relevant sub-parts of this policy (b, c, d (ii) and (v)) are identified: In relation to points (b) and (c) The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) presents the assessment of the likely significant ecology and biodiversity effects that could result from the Project. The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally

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	mitigate and compensate for the adverse environmental effects of development. d) All development should take all reasonable opportunities to: i. Make a positive contribution to local character and distinctiveness; ii. Enhance biodiversity to achieve a net gain for nature; iii. To improve the resilience of ecosystems to environmental change including through the provision of improvements to enhance identified environmental sites; stepping stones and corridors; iv. Protect environmental and water resources and enhance their efficient use; v. Deliver the provision of essential infrastructure including water and wastewater network upgrades, waste facilities', flood defences and green infrastructure; vi. Enhance, re-use and better reveal the significance of heritage assets; vii. Re-use buildings rather than demolish, recycle building materials and select materials to maximise environmental sustainability and minimise impact on scarce resources and environment; viii. Generate and utilise renewable energy in appropriate ways; and ix. Work with the characteristics of the location to ensure that the necessary mitigation measures are not disproportionate to the benefits of the scale of development proposed".	designated biodiversity sites and other important ecological features such as protected species and habitats, during the construction and operation (including maintenance). Point (b) also requires the protection of assets of historic significance. ES Chapter 11 Historic Environment (document reference 6.11) reports the assessment of the likely significant historic environment effects that could result from the Project. ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets (document reference 6.11.A7) found that the Project would not result in substantial harm to any heritage assets. Chapter 11: Historic Environment (document reference 6.11) concludes that within South Norfolk the project would result in a medium adverse magnitude of impact resulting in a permanent moderate adverse significance of effect (significant) to 2 designated assets and 8 non-designated assets. This impact is assessed as less than substantial. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which sets out that the SoS will take as the starting point or decision making that CNP infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. In relation to point (c) and (d) (ii) National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain. The

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		Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1). There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required. With regarding to point d (v) on green infrastructure a landscape strategy has been prepared for the Norwich Main Substation which provides a collaborative approach to delivering landscape and biodiversity mitigation (Outline Landscape and Ecological Management Plan (document reference 7.4)) as secured by Schedule 3 of the draft DCO (document reference 3.1). This landscape strategy has been developed in recognition of the local landscape policies and landscape character, considering the opportunities for local landscape and biodiversity enhancements. It has been developed as part of the iterative process of design and assessment.
DM 3.8 Design Principles applying to all development	1) "The Council will work with applicants to achieve high quality design and positive improvement from all development, protect and enhance the environment and existing locally distinctive character and encourage innovation; the Council will refuse development that fails to take the opportunities for improving the character and quality of an area and the way the area functions. 2) Major development should be master planned using an inclusive recognised process demonstrating how the whole scheme will be delivered and related to adjacent areas, including the programming of infrastructure requirements. A masterplan will also be	Points 1, 2, and 4 are relevant to the development and have been included in this assessment. However not all parts of point 4 have been included (criterions a, b, f, and e are included) as the other criterions are not relevant to a linear infrastructure project. In accordance with Point 1 and 2 the design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. The Design Development Report (document reference 5.15) provides an explanation of the main changes in the route alignment and technology following the review and consideration of feedback received

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	required for sites of less than 500dwellings in the case of large developments incorporated into a smaller settlement or on sites of particular complexity… 4) Planning permission will be granted for development that has been designed to, where relevant to the proposed development: respect adjoining structures, spaces, routes and local landscape; provide an attractive, accessible and safe environment; and conform to the following criteria: a. The scale, height, massing, form and appearance of development is designed with a satisfactory relationship of structures, spaces and routes within the site and a successful integration into the surroundings; b. The development is created with high standards of design, building materials, finishes and landscaping reflecting the use of distinctive local building traditions, materials and heritage assets where relevant; or innovative contemporary design solutions reflecting local context and reinforcing or creating local distinctiveness. f. Buildings and spaces are orientated to: gain benefit from sunlight and passive solar energy and wherever possible designed around a Sustainable Drainage system… h. Landscaping of the development is designed to retain important existing natural features, reflect the surrounding landscape characteristics of the area and contribute to relevant objectives of the local Biodiversity Action Plan…".	to the 2024 statutory consultation and to the targeted statutory and non-statutory consultations held in 2025. In relation to Point 4, (a) a Design and Access Statement DAS (document reference 7.15) has been produced which provides a summary of National Grid's approach to good design and demonstrates how National Grid has responded to the physical, environmental and socio-economic context of the overhead line route and Norwich Main substation location and responded to consultation to define the Project. Fundamentally, the routeing of the transmission corridor and the siting of the site-specific infrastructure has been optimised to balance function and aesthetics, minimising environmental impact, including landscape and visual. This has been the approach from the outset of The Project through the strategic optioneering process, as documented in the Strategic Optioneering Report (SOR). As stated, regard has been had to the Horlock and Holford rules in respect to the siting of new transmission infrastructure and substations and as described in detail in Chapter 5 of this the Planning Statement. (document reference 5.6) Both sets of rules have been deployed by National Grid and have formed an important part of developing the preferred route and design of the Project. For example; the route seeks to avoid siting infrastructure in areas with significant amenity value; the most direct route is preferred to avoid the need for additional angle pylons; siting infrastructure in areas benefiting from existing advantageous vegetation screening is preferred; and densely populated urban/residential areas are avoided, where possible. Essentially the Project's route alignment has been selected because it performed more strongly

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		overall than any other options, having regard to these factors (amongst others) and national planning policy. With regard to point 4 (b) the Design Appraisal Site Specific Infrastructure DASSI (document reference 7.16) considered in more detail how the scale, height, massing, form and appearance, and the materials and finishes of the new Norwich Main substation works within the South Norfolk Council section of the Project route. The DASSI notes that the new will be constructed to National Grid's design standards and will include a number of shunt reactors, GIS, GIS building, annex building and other necessary equipment. The design of the substation will largely be guided by National Grid's operational requirements and technical design standards. Design limitations due to the nature of electricity transmission infrastructure, and National Grid's regulatory and other constraints (such as operational, safety and security requirements), are recognised in DAS Section 6.4.34. In accordance with point 4 (f) the Outline CoCP (document reference 7.2) describes the good practice measures including SuDS for managing surface water flood risk that would be adopted. Good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime. The FRA (document reference 7.9) states that access roads and haul roads, as well as areas where impermeable material will be installed in areas where heavy equipment would be used, will also have suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff appropriate to local conditions. Appendix C of the FRA (document reference 7.9) contains further details on SuDS.

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		With regard to point 4 (h) the overarching aim of the landscape design is to retain vegetation wherever practicable in accordance with good practice measures as outlined within the Outline CoCP (document reference 7.2). During construction any sensitive habitats will be demarcated to ensure contractors protect as much vegetation as possible and avoid or minimise adverse landscape and visual effects as far as practicable.
DM 3.11 Safety and the free flow of traffic	1) "On all sites development will not be permitted that endangers highway safety or the satisfactory functioning of the highway network. 2) Planning permission will be granted for development involving the formation or intensified use of a direct access onto a Corridor of Movement providing it would not: (a) Prejudice the safe and free flow of traffic or planned proposals for sustainable transport initiatives along the Corridor of Movement; (b) Be practical to gain access from the site to the Corridor of Movement via a secondary road; and (c) Facilitate the use of the Corridor of Movement for short local journeys".	The Transport Assessment (document reference 7.11) assesses the potential for disruption to infrastructure during construction. The Project is expected to generate very low level vehicle movements during operational and maintenance phase, therefore operational effects to the transport network have been scoped out of the assessment due to the low vehicle numbers anticipated during operation. The conclusions presented in ES Chapter 16: Traffic and Transport (document reference 6.16) demonstrate that with mitigation measures, the assessment of traffic generated during construction of the Project will not result in significant adverse effects on road users, equestrians, walkers, cyclists and horse riders and road links in terms of delay, severance, amenity, fear and intimidation, accidents and road safety, and parking and loading. Embedded mitigation measures comprise of the inclusion of a largely continuous haul road to be used by construction vehicles reducing construction traffic on the local road network.
DM 3.13 Amenity, noise and quality of life	1) "Development should ensure a reasonable standard of amenity reflecting the character of the local area. In all cases particular regard will be paid to avoiding:	The Project accords with this policy as set out below, where the relevant sub-parts of this policy are identified: In relation to point 1 (a) and (b) visual effects to amenity of residential properties as a result of the Project are

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	a) Overlooking and loss of private residential amenity space b) Loss of day light, overshadowing and overbearing impact c) Introduction of incompatible neighbouring uses in terms of noise, odour, vibration, air, dusts, insects, artificial light pollution and other such nuisances. Planning permission will be refused where proposed development would lead to an excessive or unreasonable impact on existing neighbouring occupants and the amenity of the area or a poor level of amenity for new occupiers. 2) In considering applications which may result in an increase in noise exposure, account will be taken of the operational needs of the proposed and neighbouring businesses, the character and function of the area including background noise levels at different times of day and night and the need to protect areas of rural tranquillity. 3) Development will not be permitted where the proposed development would generate noise or artificial light which would be significantly detrimental to the amenity of nearby residents or the occupants of other noise sensitive uses. Proportionate mitigating measures including limiting conditions will be used to reduce the potential noise or artificial light impact to an appropriate level whenever practical to do so".	considered in ES Appendix 13.4: Residential Visual Amenity Assessment (document reference 6.13.A4). The assessment concluded that most residential properties within the Study Area of 200 m would not be detrimentally affected by the Project. In some instances however a high visual change of a high magnitude would be experienced therefore mitigation measures have been recommended to reduce effects on these properties. ES Chapter 13: Landscape and Visual (document reference 6.13) sets out the mitigation measures in more detail. On the assumption that all mitigation is in place during construction and operation the Project is not thought to introduce an incompatible use to any areas. In relation to point 1 (c) and 2, ES Chapter 14: Noise and Vibration (document reference 6.14) presents the assessment of the likely significant noise and vibration effects that could result from the construction of the Project. The Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects in accordance with Paragraph 4.1.5 of NPS EN-1. The assessment concluded with the relevant standard mitigation measures and best practicable means (BPM) set out in Appendix F: Outline Noise and Vibration Management Plan to the Outline CoCP (document reference 7.2) relating to noise and vibration the residual effect of construction noise will not be significant to all nearby noise and vibration sensitive receptors (NSRs) during both daytime and nighttime periods. Further detailed construction noise and vibration assessments will be undertaken by the main works contractor(s) prior to commencing works. Operational noise from overhead lines is scoped out of the ES, in accordance with the Scoping Opinion (document

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning the Policy
		reference 6.20), on the basis that a low noise conductor system is proposed. However, additional information regarding operational noise impacts from the overhead lines is provided for information in ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) (document reference 6.14.A5) In relation to the Project's effects on air and dust, ES Chapter 7: Air Quality (document reference 6.7) assesses the likely air quality effects that would result from the Project and considers the existing baseline conditions and the likely changes and effects to air quality levels during the construction phase. The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. An assessment of construction dust impacts on local amenity and ecological sites is also provided as detailed in ES Appendix 7.1: Air Quality Assessment Methodology (document reference 6.7.A1) and ES Appendix 7.3: Air Quality Assessment Results (document reference 6.7.A3). The assessment confirms that with the implementation of the proposed standard mitigation measures, the effects of construction on air quality in regard to dust soiling, and human health effects are anticipated to be not significant. As set out in the Scoping Report (document reference 6.19) and agreed within the Scoping Opinion (document reference 6.20), the operational phase of the Project will not result in any significant impacts to air quality and no further assessment has been carried out in the ES. The Outline CoCP (document reference 7.2) sets out the mitigation measures that will be put in place to minimise impacts to amenity of neighbouring uses.

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning the Policy
		In relation to point 1 (c) and 3, Light pollution impacts of the Project have been assessed in ES Chapter 8: Ecology and Biodiversity (document reference 6.8) and ES Chapter 13: Landscape and Visual (document reference 6.13) which assess the likely significant effects of the Project in relation to ecology and biodiversity, and landscape and visual. The assessment of lighting in both these ES chapters has been based on the assumptions that: All works associated with substation - exterior and interior lighting would be provided at the site to allow for safe movement and the operation of equipment. All lighting would be designed in accordance with the appropriate design standards and be motion-sensor activated. A typical construction day will consist of 12-hours meaning in winter this would require working in the dark at either end of the day. For the purposes of the ES, it is therefore assumed that winter working will require lighting at certain sites but will not be wide scale across the Project. The Outline CoCP (document reference 7.2) sets out the good practice measures to be put in place to limit construction light pollution to protect Ecology, Biodiversity, and Landscape and Visual environments during construction and operation.
DM 3.14 Pollution, health and safety	"All development should minimise and where possible reduce the adverse impact of all forms of emissions and other forms of pollution, and ensure that there is no deterioration in water quality or water courses. When assessed individually or cumulatively, development proposals should ensure that there will be no unacceptable impacts on: i. Air quality	In relation to point (A) and (B) the Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts associated with emissions and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works.

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	ii. Surface and ground water quality iii. Land quality and condition iv. Health and safety of the public Permission will only be granted on or near contaminated land if it is subject to remediation which will make it safe for the proposed use. On a contaminated site or one suspected to be contaminated or within 250 metres (or on more if considered appropriate on a risk-based approach) of an existing or disused landfill site, applications will need to be accompanied with an assessment of the extent of contamination on the site and any possible risks. Developments which may impact on air quality will not be permitted where they have an unacceptable impact on human health, sensitive designated species or habitats, and general amenity, unless adequate mitigation can be ensured. Development will not be granted in locations where it is likely to result in an Air Quality Management Area being designated or the worsening of air quality in an existing Air Quality Management Area. Permission will not be granted for development on or in the vicinity of hazardous installations including high pressure gas and oil pipelines unless the development would not give rise to additional public risk".	B) Appendix A3 Inter-Project Cumulative Effects of ES Chapter 17: Cumulative Effects (document reference 6.17) assesses the cumulative effects of the Project with other projects and concludes that in most instances in South Norfolk there will be a negligible and not significant impact in relation to air quality and health and wellbeing of the public. The assessment does not extend to surface and ground water quality or land quality and condition as it is a desk-based assessment. C) ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9) considers land contamination and is supported by a Preliminary Contamination Risk Assessment (PRA) (ES Appendix 9.1: Baseline Information and Preliminary Contamination Risk Assessment (document reference 6.9.A1)). The PRA has identified a generally 'very low/low risk' of significant existing contamination to be present within most of the Order Limits. A worst case 'very high' risk has been identified within small discrete sections of the Order Limits. Prior to construction, these sites will be individually investigated and assessed in accordance with Land Contamination Risk Management (Environment Agency, 2023)) to determine any additional mitigation measures or remediation requirements. The nature and scope of any mitigation or remediation would be agreed with the Environment Agency and Local Authority (as appropriate). Standard mitigation measures within the Outline CoCP (document reference 7.2) will be adopted during construction to deal with unexpected land contamination. D) ES Chapter 7: Air Quality (document reference 6.7) assesses the likely air quality effects that would result from the Project and considers the existing baseline conditions and the likely changes and effects to air quality levels

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		during the construction phase. As set out in the Scoping Report (document reference 6.19) and agreed within the Scoping Opinion (document reference 6.20), the operational phase of the Project will not result in any significant impacts to air quality and no further assessment has been carried out in the ES. The assessment confirms that with the implementation of the proposed standard mitigation measures, the effects of construction on air quality in regard to dust soiling, and human health effects are anticipated to be not significant. The Project Order Limits do not interact with any hazardous installations.
DM 4.2 - Sustainable drainage and water management	1) "Sustainable drainage measures must be fully integrated within design to manage any surface water arising from development proposals, and to minimise the risk of flooding on the development site and in the surrounding area, unless it can be demonstrated that ground conditions are unsuitable for such measures or there are other exceptional circumstances. 2) Details showing how proposed drainage measures will fully integrate with the design of development and how the drainage system will contribute to the amenity and biodiversity of the development must be made clear within applications for full planning permission. Drainage features should make a positive contribution to amenity and biodiversity. 3) All developments (including that on previously developed land): a) Should include a sewerage capacity assessment and must have a neutral or positive impact on reducing surface water flooding and should	See response to Policy DM 3.8 Design Principles Applying to All Development for response on how SuDS have been incorporated in the design of the Project.

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	include drainage features that will slow the movement of water through the drainage system; b) Must not cause any deterioration in water quality and measures to treat surface water runoff must be included within the design of the drainage system; c) Must be served by separate surface water and foul wastewater drainage. No new development (including redevelopment) will be permitted to discharge surface water runoff to foul drainage connections or combined sewers, unless it can be demonstrated that separate surface water drainage is not available and cannot be practicably provided; and d) Should maximise use of soft landscaping and permeable surfaces unless the developer can provide justification to demonstrate that this is not feasible. 4) Applications which do not demonstrate how sustainable drainage has been taken into account in the design may be refused".	
DM 4.4 - Natural environmental assets - designated and locally important open space	"The highest status natural environmental assets are identified on the Policies Map and in supporting evidence, and will be protected from any significant harmful impact arising from new development. New development impacting on these designated sites will be required to contribute positive improvement of these natural environmental assets where opportunities arise. International, National and County-wide level sites will be accorded the highest levels of priority.	The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce adverse environmental impacts through the process of design development, and by embedding measures into the design of the Project. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) presents the assessment of the likely significant ecology and biodiversity effects that could result from the Project. The chapter concludes there will be some temporary impact associated with the construction phase to

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	At the Important Local Open Spaces identified in paragraphs 4.32 – 4.44 and on Maps 4.4 (1) – (6) and on the Proposal Map, development will only be permitted where it retains the open character and appearance of the site, where it respects the contribution which the identified open site or open frontage makes to the form and character of the Settlement and where there is no significant adverse impact on the setting of any existing building. New development impacting on these designated sites will be required to contribute positive improvement of these natural environmental assets where opportunities arise. Developers will need to work with partners to evolve strategies to enable individual new development sites to contribute most effectively to the opportunities for the establishment and positive improvement of coherent ecological networks, Biodiversity Enhancement Areas and multi-functional Green Infrastructure Networks".	both statutory designated sites and non-statutory designed sites. These temporary impacts will be mitigated through the standard mitigation measures set out in the Outline CoCP (document reference 7.2) which will remove potential significant effects associated with dust, noise and hydrological effects on most statutory designated sites within the Study Area. Additional mitigation will be required in Royden Fen LNR in the form of nesting bird checks (within 500 m of the working area) due to habitat quality present to support breeding Schedule 1 birds that are susceptible to disturbance (such as marsh harrier). The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, during the construction and operation (including maintenance) phases. Through the application of the migration hierarchy the Project has sought to avoid works within areas of designated open space throughout. Table B.1 of Planning Statement Appendix B: Open Space Assessment (document reference 5.6) provides an overview of open spaces that are located within or adjacent to the Order Limits of the Project. In South Norfolk. The Project will not result in the loss of any Important Local Open Spaces and therefore Policy DM 4.4 is not engaged. With regard to point (c) the Project will contribute to the establishment of ecological networks. A landscape strategy has been prepared for the Norwich Main Substation which provides a collaborative approach to delivering landscape and biodiversity mitigation (Outline Landscape and Ecological Management Plan (document reference 7.4)) as secured by Schedule 3 of the draft DCO (document reference 3.1). This landscape strategy has been

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		developed in recognition of the local landscape policies and landscape character, considering the opportunities for local landscape and biodiversity enhancements. It has been developed as part of the iterative process of design and assessment.
DM 4.5 - Landscape Character and River Valleys	"All development should respect, conserve and where possible, enhance the landscape character of its immediate and wider environment. Development proposals that would cause significant adverse impact on the distinctive landscape characteristics of an area will be refused". "All development proposals will be expected to demonstrate how they have taken the following elements (from the 2001 South Norfolk Landscape Assessment as updated by the 2012 review) into account: • The key characteristics, assets, sensitivities and vulnerabilities; • The landscape strategy; and • Development considerations. Particular regard will be had to protecting the distinctive characteristics, special qualities and geographical extents of the identified Rural River Valleys and Valley Urban Fringe landscape character types".	The full assessment of the potential residual effects of the Project on landscape and visual amenity is contained in ES Chapter 13: Landscape and Visual (document reference 6.13) and ES Appendix 13.2: Landscape Baseline and Assessment (document reference 6.13.A2), ES Appendix 13.3: Visual Baseline and Assessment (document reference 6.13.A3) and ES Appendix 13.4: Residential Visual Amenity Assessment (document reference 6.13.A4). The landscape and visual amenity assessments indicate that the construction phases would result in significant negative landscape and visual amenity effects during construction. These significant effects are related to the introduction of construction activity and equipment, including the loss of some landscape features including farmland and field boundary vegetation. At Year 15 of operation, following the maturation of mitigation planting, the assessment concludes that significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure projects, as set out in Paragraphs 5.10.5 and 5.10.13 of NPS EN-1. The Project has been designed carefully and incorporates measures to mitigate harm to landscape and visual receptors, having regard to National Grid's statutory duty under Schedule 9 of the Electricity Act 1989 (in line with Paragraph 2.2.10 of NPS EN-5). However, some significant residual landscape and visual adverse effects will remain,

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		as is inevitable with nationally significant energy infrastructure of the scale and type proposed. In the case of CNP infrastructure (such as the Project), "these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure''. The SoCG prepared with South Nortfolk District Council (document reference 5.9.5) notes concerns regarding the potential impact on the Waveney Valley due to National Grid's decision to not underground in this location. South Norfolk District Council have requested a scheme of landscape enhancement to be used to offset the residual adverse impacts of the overhead line. This topic remains under discussion.
Policy DM 4.6 – Landscape Setting of Norwich	All development proposals will not harm and where possible should enhance the landscape setting of Norwich with regard to the following considerations: NSBLPZ All development proposals within the Norwich Southern Bypass Landscape Protection Zone (NSBLPZ), as shown on the Policies Map, should have regard to protecting the openness of the Zone and, where possible, enhancing the landscape setting of the southern bypass, including the practice of wild flower planting and management regimes. Key Views All development proposals located within the Key Views 'cones' shown on the Policies Map should ensure they do not obstruct the long-distance views to and from the City. Undeveloped Approaches All development proposals within the visual zone of influence viewed from the identified Undeveloped Approaches to Norwich should reinforce and avoid	The Order Limits for the Project sit outside but adjacent to the NSBLPZ. The works proposed at Norwich Substation would be adjacent to the NSBLPZ. To mitigate visual impacts to surrounding landscapes around Norwich Substation an Environmental Area is proposed to the north of the Substation to aid in screening. The full assessment of the potential residual effects of the Project on landscape and visual amenity is contained in ES Chapter 13: Landscape and Visual (document reference 6.13) and ES Appendix 13.2: Landscape Baseline and Assessment (document reference 6.13.A2), ES Appendix 13.3: Visual Baseline and Assessment (document reference 6.13.A3) and ES Appendix 13.4: Residential Visual Amenity Assessment (document reference 6.13.A4). The landscape and visual amenity assessments indicate that the construction phases would result in significant negative landscape and visual amenity effects during construction. These significant effects are related to the introduction of construction activity and equipment, including the loss of some landscape features including farmland and field boundary vegetation. At Year 15 of

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	undermining the rural character of the Undeveloped Approaches to Norwich. Gateways All development proposals on the approaches to defined Gateways (shown on the Proposal Map) shall reinforce and avoid undermining the significance of these Gateways as the visual points of the landscape and townscape change marking the 'arrival' at and 'departure' from the city of Norwich. Development which would significantly harm the NSBLPZ or the landscape setting of the Norwich urban area will not be permitted".	operation, following the maturation of mitigation planting, the assessment concludes that impacts on some visual receptors in proximity to the Norwich Substation extension would reduce as a result of landscape mitigation within Environmental Areas, although effects in relation to the proposed overhead line would remain. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure projects, as set out in paragraphs 5.10.5 and 5.10.13 of NPS EN-1.
DM 4.8 - Protection of Trees and Hedgerows	"The Council will promote the retention and conservation of significant trees, woodlands and traditional orchards and will serve Tree Preservation Orders where necessary. The Council will presume in favour of the retention of 'important' hedgerows as defined by the Hedgerows Regulations 1997. The Council will safeguard and promote the appropriate management of protected and other significant trees and hedgerows, unless the need for, and benefits of, a development clearly outweigh their loss".	The Project has been designed in a way which prioritises the retention of vegetation wherever practicable in accordance with good practice measures as outlined within the Outline CoCP (document reference 7.2). Owing to the size of the Project it has not been possible to completely avoid the loss of such natural features. The Outline LEMP (document reference 7.4) sets out the principal measures that are required to help avoid, minimise, mitigate and compensate (where relevant) the impacts to vegetation. In relation to Ancient Woodlands, the physical extent of each ancient woodland along the Project has been mapped based on a combination of aerial imagery and based on information obtained from the ground truthing woodland surveys. Table 8.23 in ES Chapter 8: Ecology and Biodiversity (document reference 6.7) lists the Ancient Woodlands identified within a 200m of the Project's Order Limits and identifies the proposed mitigation measure/commitment. The location and further information relating to all Ancient Woodlands is presented within Appendix 8.1: Habitats Report and presented on Figure A8.1.3: Ancient Woodland Locations (document reference

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		6.8.A1). In addition, the Project has considered 11 woodlands to be Ancient Woodland within ES Chapter 8: Ecology and Biodiversity (document reference 6.8) due to the Local Wildlife Site citations mentioning these woodlands support ancient woodland features. These woodlands have therefore been included in the impact assessment as Ancient Woodland. Potential impacts (excavation and non-excavation), in the absence of mitigation, were identified at 10 ancient woodland parcels. As a result of these Project commitments impacts associated with five ancient woodlands have been completely avoided. The remaining 5 ancient woodlands (and the associated 15 m buffer) is unavoidable as all proposed works relate to the removal, undergrounding or modification of existing third-party infrastructure (11 kV, 33 kV, 132 kV), with the existing assets already located within the associated woodland or root protection zone. The assessment concluded that there are no Ancient Woodlands within South Norfolk (Section A of the Project route). A comprehensive explanation of the Project approach to ancient woodland avoidance and minimisation of impact on ancient woodland is detailed in Appendix B: Ancient Woodland and Veteran Tree Strategy (document reference 7.4.B) With regard to veteran trees, the Ancient Woodland and Veteran Tree Strategy (Appendix B of the LEMP (document reference 7.4)) has been produced to detail the environmental measures that would be implemented to avoid, minimise, mitigate and compensate the ancient and/ or veteran features likely to be impacted during construction and operation, as reported in ES Chapter 8: Ecology and Biodiversity (document reference 6.8), ES Chapter 13: Landscape and Visual (particularly in relation to Tree Preservation Orders and veteran trees) (document

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		reference 6.13) as well as the Outline LEMP (document reference 7.4) and Arboricultural Impact Assessment (AIA) (document reference 6.13.A6). In accordance with the mitigation hierarchy set out in the Ancient Woodland and Veteran Tree Strategy in the first instance the Project has sought to avoid, minimise and rectify impacts to veteran trees. Where this isn't possible then suitable compensation is required. A total of 112 trees and four groups have been surveyed within the Project Study Area as veterans. Four individual veteran trees require removal, while 15 veteran trees and two veteran groups require crown management. Veteran trees are acknowledged as being irreplaceable, therefore full compensation is unachievable. Compensation planting will include a combination of new planting, sapling relocation, seed bank for local provenance, and financial contributions to local tree planting organisations to plant and maintain new areas of planting off-site with a commitment to maintain and monitor compensation areas for a minimum of 30 years. Veteran trees to be removed will still provide essential habitats for the local flora and fauna. Where practical, after being felled, each tree should be laid as close to their original location as possible or near existing woodland to provide a deadwood habitat area. With regard to Important Hedgerows, ES Chapter 8: Ecology and Biodiversity (document reference 6.8) concludes that there would be both temporary and permanent loss within the Order Limits of the Project. The hedgerows that would be lost on a temporary basis would be reinstated in line with the habitat reinstatement principles set out in the Outline LEMP (document reference 7.4). Mitigation for the permanent loss of hedgerows would

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		be delivered through the creation/ enhancement of habitat associated with achieving a minimum of 10% biodiversity net gain for the Project. Hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once re-established. Following the application of mitigation, it is concluded that there would be an overall negligible magnitude of impact with no significance residual effect on Important Hedgerows.
DM 4.9 - Incorporating landscape into design	"Where appropriate, detailed development proposals must demonstrate a high quality of landscape design, implementation and management as an integral part of the new development. The provision for new planted features (such as tree belts, hedgerows, wild flowers and specimen trees) is expected to form part of development proposals from their outset and should provide an appropriate landscape setting for the scheme. 'Hard' landscape features (such as paving, kerb stones, street furniture, boundary treatments etc) will reflect and where possible enhance locally distinctive character and styles where relevant; or innovative contemporary solutions reflecting local context and reinforcing or creating local distinctiveness and the setting of the development. Landscape schemes will be required to respect the character and distinctiveness of the local landscape and should ensure that any land remodelling respects the local topographic character in terms of height, slope, angle and character. Landscape schemes should be clearly and properly specified".	The land around National Grid permanent assets, where there is sufficient space, has been defined as Environmental Areas. These areas will provide landscape and visual screening benefits, as well as offering ecological value. There will be a total of 6 Environmental Areas along the route. Within South Norfolk Council the following sites have been identified as Environmental Areas: Land around Norwich Main Substation (areas not included in the Norwich Main Substation Extension Planning application) The measures proposed are designed to filter and screen views from the surrounding area to reduce significant effects on local residents and users of public rights of way networks. The proposals will help to connect existing hedgerows to improve green networks and enhance landscape character and to provide replacement woodland and hedgerow planting as close to permanent impacts as possible. At the Norwich Main Substation (the only Environmental Area within the South Norfolk: Section A of the Project), National Grid is proposing to retain and enhance and reinstate hedgerows and areas of woodland (excluding areas under and adjacent to overhead lines).

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		Details of the Environmental Areas are outlined in the Outline Landscape and Ecological Management Plan (document reference 7.4) and Appendix D: Outline Landscape Proposals of the Outline LEMP. The proposals for Norwich Main Substation are presented on drawing 12055-LUC-XX-XX-DR-L-0001.
DM 4.10 - Heritage Assets	"All development proposals must have regard to the historic environment and take account of the contribution which heritage assets make to the significance of an area and its sense of place, as defined by reference to the national and local evidence base relating to heritage. Change of use, alterations and extensions affecting the significance of a designated heritage asset, including its setting, must have regard to and positively respond to, that significance. Proposals must sustain, and where possible enhance and better reveal the significance of the asset and make a positive contribution to local distinctiveness. Proposals must show how the significance of the heritage asset has been assessed and taken into account by reference to the Historic Environment Record, suitable expertise and other evidence/research as may be necessary. Considerable importance and weight must be given to the desirability of preserving listed buildings, their settings and the character and appearance of conservation areas. Development should avoid causing any loss to a heritage asset, or harm to it. Substantial harm or total loss will only be justified where it can be demonstrated that it is necessary to achieve substantial benefits or where the retention of the asset is unsustainable, no viable alternatives can be identified	ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potential significant adverse effects on cultural heritage and archaeological assets. For details on the impacts to heritage assets within South Norfolk Council see the response relating to the historic environment in response to Policy DM 1.4 Environmental Quality and Local Distinctiveness. The local planning authority have raised concerns about the evaluation of non-designated heritage assets in the report and that these appear to be evaluated in terms of archaeological value and stated as having evidential or historic value whereas historic buildings are also likely to have architectural value. Discussions around the evaluation of non-designated heritage assets is ongoing. See Draft Statement of Common Ground South Norfolk District Council (document reference 5.9.5).

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	and the harm or loss is outweighed by the benefits of bringing the site back into use. Less than substantial harm will only be justified where there are public benefits that outweigh the harm. In carrying out this planning balance, less than substantial harm will be afforded considerable importance and weight. Proposals which adversely affect the significance of a heritage asset will only exceptionally be permitted where clear and convincing justification is provided".	
Breckland Council Local Plan (2023)		
Policy TR 01 Sustainable Transport Network	"Development should: • seek to minimise the need to travel; • promote opportunities for sustainable transport modes; • not adversely impact on the operation or safety of the strategic road network; • improve accessibility to services; and support the transition to a low carbon future".	Whilst the Project's Order Limits do not extend into Breckland Council there is a construction access routes which does. The assessment presented in ES Chapter 16: Traffic and Transport (document reference 6.16) concludes that with mitigation measures, no significant adverse effects on road users, including PRoW users, and on the use and safety of the road network, are anticipated during construction. The effects of the Project for Traffic and Transport during operation (and maintenance) have been scoped out of the assessment in accordance with the EIA Scoping Opinion (document reference 6.20). Measures to manage construction traffic impacts are set out in the Outline Construction Management Plan Appendix A – AIL Access Strategy (document reference 7.3A) and Appendix B – Outline Construction Worker Travel Plan (document reference 7.3B). These documents also explain the approach to travel planning for construction staff including promoting walking and cycling and public transport. Mitigation measures to reduce impacts on PRoW during construction are set out in the Outline PRoW

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		Management Plan (document reference 7.6) and secured by Requirement 4 of Schedule 3 of the Draft DCO (document reference 3.1).
Policy TR 02 Transport Requirements	"Developments should be of high quality, sustainable in design, construction and layout as well as offering maximum flexibility in the choice of travel modes for all potential users. Proposals will be permitted that: • integrate satisfactorily into existing transport networks; • mitigate impacts on the local or strategic highway networks arising from the development itself, or the cumulative effects of development, through the provision of, or contributions towards, any relevant transport improvement deemed to be necessary, including those secured by legal agreement; • protect, and where possible enhance, access to public rights of way; • provide safe, suitable and convenient access for all users, including appropriate parking and servicing provision in terms of amount, design and layout (Appendix 2 provides a starting point); and • avoid inappropriate traffic generation and do not compromise highway safety. Development proposals that are likely to generate a significant number of heavy goods vehicle movements will be required to demonstrate by way of a Routing Management Plan that no severe impacts will be caused to the efficient and safe operation of the road network and no material harm caused to the living conditions of residents. Major development proposals should include an assessment of the impacts of new development on the	See response to Policy TR 01 Sustainable Transport Network above.

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	existing transport network; and demonstrate how they will maximise connectivity within and through a development and to the surrounding areas, including the provision of high quality and safe pedestrian and cycle routes. Where potential transport impacts are identified, developers will be expected to produce Transport Assessments to assess the impacts and identify appropriate mitigation, together with Travel Plans where appropriate".	
Policy ENV 02 Biodiversity protection and enhancement	"The highest level of protection will be given to European Sites, with development only permitted where the proposal is in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017. Where measures to mitigate for potential adverse effects on European sites are required, the proposed mitigation measures must be justified as fit for purpose with appropriate evidence, to inform the Council's Habitats Regulations Assessment. Development likely to have an adverse effect (either directly or indirectly) on a site of national, regional or local biodiversity, or geological interest, as identified on the Policies Map, will not be permitted unless: a. it can be clearly demonstrated that there are reasons for the proposal that outweigh the need to safeguard the special ecological / geological interest of the site, and; b. it has been demonstrated, where development would result in significant harm, that it cannot be reasonably located on an alternative site that would result in less or no harm, and;	The Project's Order Limits do not extend into Breckland Council however it is recognised (in ES Chapter 8: Ecology and Biodiversity (document reference 6.8)) that CIEEM EcIA Guidelines (CIEEM,2018) require assessments to be focused on a Zone of Influence (ZOI) defined as being the area which changes arising from construction and operation (and maintenance) could lead to ecologically significant effects. The ZOI for ecology impacts therefore extends into Breckland Council. ES Chapter 8: Ecology and Biodiversity (document reference 6.8 concludes that the Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction and operation (including maintenance) phases.

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	c. residual harm, after all measures to prevent and adequately mitigate have been applied, will be adequately compensated for. Where the Council considers that a designated site, protected species or any species or habitat, particularly where listed as a Priority Habitat or Species under Section 41 of the Natural Environment and Rural Communities Act (2006), may be adversely affected by a development proposal, an ecological assessment (EcIA) will be required to be submitted with the planning application to assess effects on flora and fauna, commensurate with the scale of the impact and the importance of the species. In accordance with the stepwise approach to protecting biodiversity (the mitigation hierarchy), all development with the potential to affect biodiversity should demonstrate how such effects have been considered, by firstly demonstrating how effects have been avoided, and then how effects that cannot be avoided have been minimised. Residual harm, after all measures to prevent and adequately mitigate have been applied, must be adequately compensated for. All development should demonstrate how net gains for biodiversity are being secured as part of the development, proportionate to the scale of development and potential impacts (if any). Where development is permitted, the authority will consider the need for conditions or planning obligations to ensure the protection and enhancement of the site's nature conservation and / or geological interest. Wherever a proposed development may have a detrimental impact upon a designated site or protected species, appropriate conditions and/or planning obligations will be used to	

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	ensure that the appropriate mitigation measures incorporated within the proposal are fully implemented, and monitored where required. Policy ENV03 outlines specific requirements that apply to The Breckland Special Protection Area".	
Policy ENV 05 Protection and Enhancement of the Landscape	"The landscape of the District is valued for, its benefit to the rural character and in the interests of biodiversity, geodiversity and historic conservation. Development proposals will be expected to contribute to and where possible enhance the local environment by recognising the intrinsic character and beauty of the countryside. Development should have particular regard to maintaining the aesthetic and biodiversity qualities of natural and man-made features within the landscape, including a consideration of individual or groups of natural features such as trees, hedges and woodland or rivers, streams or other topographical features. Development proposals will have regard to the findings of the Council's Landscape Character Assessment (LCA) and Settlement Fringe Landscape Assessment. Development should also be designed to be sympathetic to landscape character. High protection will be given to The Brecks landscape, reflecting its role as a regionally significant green infrastructure asset. Proposals within The Brecks Landscape Character Areas will not be permitted where these would result in harm to key visual features of the landscape type, other valued components of the landscape, or where proposals would result in an unacceptable change in the landscape character. High protection will also be given to the river valleys and chalk rivers in Breckland as identified in the Landscape Character Assessment, recognising their defining natural	Whilst the Project's Order Limits do not extend into Breckland Council it is recognised that Section A of the route is within close proximity to Breckland Council's boundary therefore impacts to landscapes within Breckland Council have been included in the assessment set out in ES Chapter 13: Landscape and Visual (document reference 6.13). ES Chapter 13 notes that the assessment has been informed by information sources such as Breckland Landscape and Settlement Character Assessment. ES Chapter 13 does not identify any impacts to The Brecks landscape. ES Chapter 13 concludes that the Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats during the construction and operation (including maintenance) phases.

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	features, rich biodiversity and the undeveloped character of their shallow valleys".	
Policy COM 03 Protection of Amenity	"For all new development consideration will need to be given to general amenity impact issues, especially residential amenity. Development will not be permitted which causes unacceptable effects on the residential amenity of neighbouring occupants, or does not provide for adequate levels of amenity for future occupants. In assessing the impact of development on the living conditions of occupants, regard will be had to the following amenity considerations: 1) Odour, noise, vibration or other forms of nuisance such as artificial light pollution, insects and vermin; and 2) Other forms of pollution (including contaminated land, dust, air pollution, for example the emission of particulates etc)".	The Order Limits for the Project do not lie within Breckland Council area however a construction access route will pass through Breckland therefore only point (7) of Policy COM 03 is of relevance. The only interaction in this area will be with a primary access route through Thetford. With regard to point (7) ES Chapter 14: Noise and Vibration (document reference 6.14) presents the assessment of the likely significant noise and vibration effects that could result from the construction of the Project. The construction noise and vibration impacts of the Project. The Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects in accordance with Paragraph 4.7.3 of NPS EN-1. The assessment concluded with the relevant standard mitigation measures and best practicable means (BPM) set out in Appendix F: Outline Noise and Vibration Management Plan (document reference 7.2F) to the Outline CoCP Code of Construction Practice (document reference 7.2) relating to noise and vibration the residual effect of construction noise will not be significant to all nearby NSRs during both daytime and nighttime periods. Further detailed construction noise and vibration assessments will be undertaken by the main works contractor(s) prior to commencing works.
Suffolk Minerals and Waste Local Plan (2020)		
MP9; Safeguarding of port and rail facilities and facilities for	"When proposals are made which would result in the loss of or might potentially compromise the use of: a) an existing, planned or potential rail head, wharf or associated storage, handling or processing facilities for the bulk transport by rail or sea of minerals,	The Project has sought to avoid direct interactions with existing minerals sites, where possible, as described within Appendix 9.2: Qualitative Minerals Resource and Infrastructure Assessment (document reference 6.9.A2).

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the manufacture of concrete, asphalt and recycled materials	including recycled, secondary and marine-dredged materials, and/or; b) an existing, planned or potential site for concrete batching, the manufacture of coated materials, other concrete products or the handling, processing and distribution of substitute, recycled and secondary aggregate material. Applicants will be required to demonstrate to the County Council that those sites no longer meet the needs of the aggregates industry. Where this is not the case, satisfactory alternative handling facilities should be made available by the developer. Development proposals in close proximity to the above minerals related facilities should demonstrate that they would not prejudice or be prejudiced by those facilities. Where existing business or other use could have a significant adverse effect in any proposed new development, the applicant must provide suitable mitigation before the development is completed so that the existing use is not disadvantaged by new development. District and Borough Councils should consult the County Council when a potentially conflicting proposal falls within the 250 metre safeguarding zones as defined in the Appendix 3 Safeguarding Maps. The County Council will then refer to Policies MP9 before providing a consultation response".	The Order Limits of the Project within Suffolk crosses through several Mineral Consultation Areas (MCAs) for sand and gravel as shown on Figure 9.3: Mineral Safeguarding Areas, Mineral Consultation Areas, and Minerals Infrastructure (document reference 6.9.F3) as discussed in ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference: 6.9). The Order Limits of the Project also interacts with an existing concrete batching plant (Poundfield Products Section B). Policy MP9 of the Suffolk Minerals and Waste Local Plan (SWMLP) deals with the safeguarding of concrete manufacture and states that the County Council should be consulted where there is likely to be the loss of or the compromise of a facility. However, the Order Limits only interact with the concrete batching plant site because the Project is proposing to use the existing access roads, and the proposed pylons within this area would be positioned outside of the facility. Therefore, the Project would not cause the loss of, or compromise the works of the facility, and therefore the site is not considered further. ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference: 6.9) concludes that the temporary construction impacts on existing minerals infrastructure (very high sensitivity) would be very small. This would result in a minor effect which would be not significant. Operational impacts (and maintenance) on minerals are considered to be very small, based on the assessment presented within the MRIA. For safeguarded minerals resources (medium sensitivity), this would result in a negligible effect which is considered not significant. The ES Chapter concludes that discussions with the existing minerals operators are ongoing and subject to Statements of Common Ground (where appropriate) to

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		agree appropriate mitigation for any potential impacts on these sites.
MP10 (Minerals consultation and safeguarding areas)	"The County Council will safeguard: a) those Minerals Safeguarding Areas located within the Minerals Consultation Areas identified on the Proposals Map from proposed development in excess of five Ha The County Council will, when consulted by the Local Planning Authority, object to such development unless it can be shown that the sand and gravel present is not of economic value, or not practically or environmentally feasible to extract, or that the mineral will be worked before the development takes place or used within the development; b) areas falling within 250m of an existing, planned or potential site allocated in the Plan for sand and gravel extraction. The MPA will advise the Local Planning Authority whether any proposed development might prejudice the future extraction of minerals and should be refused, or whether such development itself might be prejudiced by proposed mineral working. District and Borough Councils should consult the County Council when a proposal falls within the Minerals Consultation Area as defined on the Proposals Map. The County Council will then refer to Policy MP10 before providing a consultation response. Responsibility for any mitigation required falls on the development that receives planning permission last".	The Project has sought to avoid direct interactions with existing minerals sites, where possible, as described within ES Appendix 9.2: Qualitative Minerals Resource and Infrastructure Assessment (document reference 6.9.A2). The Order Limits of the Project within Suffolk crosses through several Mineral Consultation Areas (MCAs) for sand and gravel as shown on ES Figure 9.3: Mineral Safeguarding Areas, Mineral Consultation Areas, and Minerals Infrastructure (document reference 6.9.F3) as discussed in ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9). The Order Limits of the Project also interacts with an existing concrete batching plant (Poundfield Products Section B). Policy MP9 of the Suffolk Minerals and Waste Local Plan (SWMLP) deals with the safeguarding of concrete manufacture and states that the County Council should be consulted where there is likely to be the loss of or the compromise of a facility. However, the Order Limits only interact with the concrete batching plant site because the Project is proposing to use the existing access roads, and the proposed pylons within this area would be positioned outside of the facility. Therefore, the Project would not cause the loss of, or compromise the works of the facility, and therefore the site is not considered further. ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9) concludes that the temporary construction impacts on existing minerals infrastructure (very high sensitivity) would be very small. This would result in a minor effect which would be not significant. Operational impacts (and maintenance) on minerals are considered to be very small, based on the

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		assessment presented within the MRIA. For safeguarded minerals resources (medium sensitivity), this would result in a negligible effect which is considered not significant. The ES chapter concludes that discussions with the existing minerals operators are ongoing and subject to Statements of Common Ground (where appropriate) to agree appropriate mitigation for any potential impacts on these sites.
WP18 Safeguarding of waste management sites	"The County Council will seek to safeguard existing sites and sites proposed for waste management use as shown on the Proposals & Safeguarding Maps and will object to development proposals that would prevent or prejudice the use of such sites for those purposes unless suitable alternative provision is made. Development proposals in close proximity to existing sites, should demonstrate that they would not prejudice or be prejudiced by a waste management facility. The safeguarding policy will also apply to any site where planning permission has already been granted. Where existing business or other use could have a significant adverse effect in any proposed new development, the applicant must provide suitable mitigation before the development is completed so that the existing use is not disadvantaged by new development. District and Borough Councils should consult the County Council when a potentially conflicting proposal falls within the 250 or 400 metre safeguarding zones as defined in the Appendix 3 Safeguarding Maps. The County Council will then refer to Policies WP18 before providing a consultation response".	The Project has sought to avoid direct interactions with existing waste sites through the routeing and siting of the Project. The Order Limits do interact with the safeguarded area around sewage treatment works at Gislingham and to the west of Offton. It is not considered that the Project would adversely affect these existing treatment works or the safeguarded area.

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Babergh and Mid Suffolk Joint Local Plan (2023)		
SP09 Enhancement and Management of the Environment	1) "The Councils will require development to support and contribute to the conservation, enhancement and management of the natural and local environment and networks of green infrastructure, including: landscape, biodiversity, geodiversity and the historic environment and historic landscapes. 2) Development within the identified Protected Habitats Sites Mitigation Zone should seek to avoid harm in the first instance. Where this is not possible, development will be required to demonstrate adverse effects on site integrity will be avoided from increased recreational pressure... 3) All development that would have an impact on a Protected Habitats Site, will be required to embed mitigation measures to avoid adverse effect on integrity. 4) Through biodiversity net gain, all development will be required to protect and enhance biodiversity ensuring the measures are resilient to climate change. 5) Where the monitoring of air quality from traffic on roads within 200 metres of Protected Habitats Sites demonstrates an adverse effect on their integrity, then the Councils will address any mitigation measures required in the Part 2 Plan".	In relation to point (1) of Policy SP09 ES Chapter 3: Alternatives (document reference 6.3) sets out how the Project had regard for designated ecological, landscape, and the historic environment sites during the routeing studies. In addition, Chapter 5 of the Planning Statement (document reference 5.6) and the Design and Access Statement (document reference 7.15) sets out how planning policy, as well as the requirements of the Electricity Act and the principles of the Holford and Horlock Rules, have influenced the optioneering and design evolution process; including limiting impacts to sites of biodiversity and geodiversity of importance, such as SSSI. In relation to point (2) and (3) part of the Order Limits of the Project which lie in Babergh and Mid Suffolk will fall within the Stour and Orwell Estuaries Special Protection Area and Ramsar Site which is a Protected Habitats Mitigation Zone. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) concludes that the Project would not directly affect the Stour and Orwell Estuaries Ramsar Site and SPA which at its closest point is 3.07 km from the Project. The wintering / passage bird surveys have identified that FLL associated with these sites is present within the Order Limits and adjacent land. Following the application of the outlined mitigation set out in the Outline CoCP (document reference 7.2) it is concluded that there would be an overall neutral negligible magnitude of impact with no significant residual effect on the Stour and Orwell Estuaries Ramsar Site and SPA. As required for by point (4) National Grid has taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will

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		deliver a minimum of 10% Biodiversity Net Gain. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1). There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required. 5) The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. ES Chapter 7: Air Quality (document reference 6.7) assesses the likely air quality effects that would result from the Project and considers the existing baseline conditions and the likely changes and effects to air quality levels during the construction phase. The assessment has considered contributions from both NOx and NH3. The assessment of construction effects at designated habitats identified several locations where the Predicted Process Contribution (PC) is greater than 1% of the critical load. Where results exceed 1% of the critical load, these have been considered further in the ecology impact assessment in ES Chapter 8: Ecology and Biodiversity (document reference 6.8). These considerations are embedded into the proposed mitigation measures outlined in Chapter 7: Air Quality (document reference 6.7).
SP10 - Climate Change	"1. The Councils will require all development to mitigate and adapt to climate change by:	Criterion (a) is relevant to the Project. A sequential approach has been taken in siting the Project. Detail on the Sequential and Exception Test are provided in Sections 5.1 and 5.2 of the FRA (document reference 7.9) submitted as

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	a. Adopting a sequential risk-based approach taking into account futureproofing measures for impacts of flooding…".	part of the application for development consent. The Project is classified as 'essential infrastructure' with respect to flooding vulnerability in the NPPF. The CSE compounds located within Babergh and Mid Suffolk Council represents part of the Project that are most vulnerable to flooding, are situated in Flood Zone 1, satisfying the Sequential Test. Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures. These measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk. ES Chapter 12: Hydrology, Land Drainage and Flood Risk notes that the most recent Environment Agency climate change guidelines (currently dating to May 2022) have been applied.
LP15 Environmental Protection and Conservation	"1. Development proposals must demonstrate appropriate consideration of the following: 2. Land Efficient and Effective Use of Resources/Land a. Previously developed land will be prioritised. Where development needs to take place on greenfield land, avoidance of the best and most versatile agricultural land should be prioritised… b. Make more efficient use or re-use of existing resources and reducing the lifecycle impact of building materials used in construction. c. Must not prejudice the ability of future allocated sites to come forward by, for example, restricting or blocking access to services such as water, gas, electricity, drainage, the free flow of air, and daylight.	The Project accords with this policy as set out below, where the relevant sub-parts of this policy are identified. With regard to point 2 (a) the nature of the Project dictates the need for development to take place on greenfield land. An assessment on the impact of the Project on agriculture is presented in ES Chapter 6: Agriculture and Soils (document reference 6.6). The assessment found that within Babergh and Mid Suffolk (Section B and C of the Project route) a large proportion of the Order Limits may comprise BMV land. The Project aims to reinstate the effected land to its pre-construction state where only temporary works are proposed. During construction, agricultural operations may experience disruption due to factors such as disturbance (in particular where livestock are present), fragmentation of land, access restrictions, or disruptions to water supplies and drainage. To mitigate these effects, good practice measures AS03, AS04, and

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	Land Contamination and Instability d. Where necessary, development will include measures to remediate land affected by contamination and avoid unacceptable proximity to hazardous sources. e. Where necessary, development will include measures to address land instability issues where identified. 3. Pollution Pollution and Environmental Amenity a. Prevent, or where not practicable, mitigate and reduce to a minimum all forms of possible pollution including, but not limited to: air, land, ground and surface water, waste, odour, noise, light and any other general amenity, including public amenity and visual amenity impacts. This must be convincingly demonstrated by impact assessments where appropriate. b. Significant adverse amenity impacts are avoided where a proposal is located adjacent to or close to existing uses. This would include an assessment of any identified amenity impacts that have a significant adverse effect and how the continued operation of existing use(s) would not be prejudiced. 4. Water a. Comply with the relevant SCC Construction Surface Water Management Plan. b. Demonstrate, in a water supply management statement, protection and where practicable enhancement of groundwater, surface water features and must not lead to a deterioration in the	AS05 outlined in the Outline CoCP (document reference 7.2) would ensure that access to affected land parcels is maintained or alternative access arrangements are communicated to landowners and occupiers. In areas of proposed permanent land-take, including the CSE compound near Little Wenham, the land use is arable. Due to the high sensitivity of BMV land, the impact on agricultural land is assessed as a major adverse effect, which is significant. The permanent land-take associated with pylon foundations has been rationalised through Project design, with pylons positioned as close as possible to field boundaries (where practicable) to minimise effects on agricultural operations. In relation to point 2 (c) interactions with allocated sites and National Grid's ongoing communication with landowners and/or Local Planning Authorities in relation to not prejudicing future allocated sites coming forward has been considered within Appendix A: Committed Developments Overlapping with Order Limits of the Planning Statement (document reference 5.6). With regards to point 2 (d) and (e) ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9) considers land contamination and is supported by a Preliminary Contamination Risk Assessment (PRA) (ES Appendix 9.1: Baseline Information and Preliminary Contamination Risk Assessment (document reference 6.9.A1)). The PRA has identified a generally 'very low/low risk' of significant existing contamination to be present within most of the Order Limits. A worst case 'very high' risk has been identified within small discrete sections of the Order Limits. Three sites have been identified in Babergh and Mid Suffolk District Council area

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	quality of the environment to help achieve the objectives of the Water Framework Directive".	(Rookery Farm and Bramford Substation) to have a moderate and above risk that requires further assessment. Prior to construction, these sites will be individually investigated and assessed in accordance with Land Contamination Risk Management (Environment Agency, 2023)) to determine any additional mitigation measures or remediation requirements. The nature and scope of any mitigation or remediation would be agreed with the Environment Agency and Local Authority (as appropriate). Standard mitigation measures within the Outline CoCP (document reference 7.2) will be adopted during construction to deal with unexpected land contamination. The Project will control potential contamination from the storage and use of hazardous substances and any risks from ground instability by implementing measures set out in the Outline CoCP (document reference 7.2). In relation to point 3 (a) An Outline CoCP (document reference 7.2) has been submitted as part of the application for development consent. This sets out the actions and measures that would be implemented to reduce the risk of a pollution to air, land, ground and surface water, waste, odour, noise, light and other such amenity. The SoCG with Babergh and Mid Suffolk Council (Draft Statement of Common Ground Babergh and Mid Suffolk (document reference 5.9.6)) notes the local planning authority's request to revise the Outline CoCP to include specifics around means of water suppression to be used and how this supply will be maintained. This topic is still under discussion. With respect to pollution and environmental amenity, from an air quality perspective, ES Chapter 7: Air Quality (document reference 6.7) assesses high, medium and low sensitivity receptors with respect to dust. An assessment is

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		also made of the likely air quality effects that would result from the Project and considers the existing baseline conditions and the likely changes and effects to air quality levels during the construction phase. The assessment confirms that with the implementation of the proposed standard mitigation measures, the effects of construction on air quality in regard to dust soiling, and human health effects are anticipated to be not significant. Surface water impacts are assessed in ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12). The majority of the permanent Project infrastructure would be located outside of the areas shown to be at 'high' risk of surface water flooding in the Environment Agency Surface Water Map. Of the places where the Project interacts with the high-risk zone for operation, the majority of these are access roads. Surface water runoff from construction sites, haul roads and operational assets would be managed using SuDS techniques appropriate to local conditions (see Appendix C of the FRA (document reference 7.9)) and through standard mitigation measures set out in the Outline CoCP (document reference 7.2). Site waste shall be managed in a structured and auditable manner in accordance with the agreed Outline Site Waste Management Plan (Appendix B of the CoCP (document reference 7.2)) from the commencement of the Project, during the detailed design stage and through construction. This ensures that the aim of waste minimisation is emphasised from the outset. In addition, it would ensure that the waste produced during the construction phase is dealt with in accordance with the relevant requirements of UK legislation, as well as any other requirements specified by the relevant regulatory authorities.

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		In relation to odour impacts resulting from the Project as identified in the Statement of Statutory Nuisance (document reference 5.4) it is not anticipated that construction activities would give rise to any material amounts of steam, smell or other effluvia. With regard to noise ES Chapter 14: Noise and Vibration (document reference 6.14) presents the assessment of the likely significant noise and vibration effects that could result from the construction of the Project. The Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects in accordance with Paragraph 4.1.5 of NPS EN-1. The assessment concluded with the relevant standard mitigation measures and best practicable means (BPM) set out in Appendix F: Outline Noise and Vibration Management Plan to the Outline CoCP (document reference 7.2) relating to noise and vibration the residual effect of construction noise will not be significant to all nearby NSRs during both daytime and nighttime periods. Further detailed construction noise and vibration assessments will be undertaken by the Main Works Contractor(s) prior to commencing works. Operational noise from overhead lines is scoped out of the ES, in accordance with the Scoping Opinion (document reference 6.20), on the basis that a low noise conductor system is proposed. However, additional information regarding operational noise impacts from the overhead lines is provided for information in ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) (document reference 6.14.A5) respectively. Babergh and Mid Suffolk Council have made comments around the content of the Noise and Vibration Management Plan (Appendix F of the Outline CoCP (document reference

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		7.2F).Their comments are summarised in ID 3.5.7 to 3.5.9 of Draft Statement of Common Ground Babergh and Mid Suffolk (document reference 5.9.6). ES Chapter 8: Ecology and Biodiversity (document reference 6.8) and ES Chapter 13: Landscape and Visual (document reference 6.13) present the assessment of likely significant ecology and biodiversity, and landscape and visual effects that could result from the Project including lighting impacts. The assessment of lighting in both these ES chapters has been based on the assumptions that: All works associated with substation - exterior and interior lighting would be provided at the site to allow for safe movement and the operation of equipment. All lighting would be designed in accordance with the appropriate design standards and be motion-sensor activated. A typical construction day will consist of 12-hours meaning in winter this would require working in the dark at either end of the day. For the purposes of the ES, it is therefore assumed that winter working will require lighting at certain sites but will not be wide scale across the Project. The Outline CoCP (document reference 7.2) sets out the good practice measures to protect Ecology, Biodiversity, and Landscape and Visual environments during construction and operation. Key measures include directional and minimised construction lighting (LV03), locating potentially disruptive activities and equipment away from sensitive receptors like residential areas and ecological sites where practicable (GG22), designing permanent lighting to minimise impacts on adjacent properties, protected species, and habitats (GG31), and ensuring construction lighting is switched off when not in use and positioned to avoid spillover onto nearby land or vegetation (B06).

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		In relation to point 3 (a) and (d) Impacts to residential amenity as a result of the Project are considered in ES Appendix 13.4: Residential Visual Amenity Assessment (document reference 6.13.A4). The assessment concluded that most residential properties within the Study Area of 200 m would not be detrimentally affected by the Project. In some instances however a high visual change of a high magnitude would be experienced therefore mitigation measures have been recommended to reduce effects on these properties. In relation to point 4 (a) and (b) measures for mitigation of surface water flood, including SuDs, are covered in ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12). The majority of the permanent Project infrastructure would be located outside of the areas shown to be at 'high' risk of surface water flooding in the Environment Agency Surface Water Map. Of the places where the Project interacts with the high-risk zone for operation, the majority of these are access roads. Surface water runoff from construction sites, haul roads and operational assets would be managed using SuDS techniques appropriate to local conditions (see Appendix C of the FRA (document reference 7.9)) and through standard mitigation measures set out in the Outline CoCP (document reference 7.2).
LP16 Biodiversity and Geodiversity	1) "All development must follow the biodiversity mitigation hierarchy. 2) Development must: a) Protect designated and, where known, potentially designated sites. Proposed development which is likely to have an adverse impact upon designated and potentially designated sites, or that will result in the loss or deterioration of irreplaceable	With regard to point 2 (a) and 3 (a – c) the Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) presents the assessment of the likely significant ecology and biodiversity

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	biodiversity or geological features or habitats (such as ancient woodland and veteran/ancient trees) will not be supported; b) Protect and improve sites of geological value and in particular geological sites of international, national and local significance; c) Conserve, restore and contribute to the enhancement of biodiversity and geological conservation interests including Priority habitats and species. Enhancement for biodiversity should be commensurate with the scale of development; d) Where possible plan positively for the creation, protection, enhancement and management of local networks of biodiversity with wildlife corridors that connect areas. This could include links to existing green infrastructure networks and areas identified by local partnerships for habitat restoration or creation so that these ecological networks will be more resilient to current and future pressures; e) Identify and pursue opportunities for securing measurable net gains, equivalent of a minimum 10% increase, for biodiversity. The Councils will seek appropriate resources from developers for monitoring of biodiversity net gain from developments. Where biodiversity assets cannot be retained or enhanced on site, the Councils will support the delivery of net gain in biodiversity off-site; and f) Apply measures to assist with the recovery of species listed in 1 of the NERC Act 2006. 3) Development which would have an adverse impact on species protected by legislation, or subsequent	effects that could result from the Project. The chapter concludes there will be some temporary impact associated with the construction phase to both statutory designated sites and non-statutory designed sites. These temporary impacts will be mitigated through the standard mitigation measures set out in the Outline CoCP (document reference 7.2) which will remove potential significant effects associated with dust, noise and hydrological effects on most statutory designated sites within the Study Area. Where the construction phase results in temporary habitat damage or loss the habitat will be reinstated post-construction ensuring there would be no long-term adverse impact. Some of the woodland habitats cannot be replaced due to safety clearances and therefore, mitigation in the form of compensation planting is proposed. The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats during the construction and operation (including maintenance). In relation to Ancient Woodlands, the physical extent of each ancient woodland along the Project has been mapped based on a combination of aerial imagery and based on information obtained from the ground truthing woodland surveys. Table 8.23 in ES Chapter 8: Ecology and Biodiversity (document reference 6.7) lists the Ancient Woodlands identified within a 200m of the Project's Order Limits and identifies the proposed mitigation measure/commitment. The location and further information relating to all Ancient Woodlands is presented within Appendix 8.1: Habitats Report and presented on Figure A8.1.3: Ancient Woodland Locations (document reference 6.8.A1). In addition, the Project has considered 11

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	legislation, will not be permitted unless there is no alternative and the LPA is satisfied that suitable measures have been taken to: a. Reduce disturbance to a minimum; b. Maintain the population identified on site; and c. Provide adequate alternative habitats to sustain at least the current levels of population. 4) Where appropriate, the LPA will use planning obligations and/or planning conditions to achieve appropriate mitigation and/or compensatory measures and to ensure that any potential harm is kept to a minimum".	woodlands to be Ancient Woodland within ES Chapter 8: Ecology and Biodiversity (document reference 6.8) due to the Local Wildlife Site citations mentioning these woodlands support ancient woodland features. These woodlands have therefore been included in the impact assessment as Ancient Woodland. Potential impacts (excavation and non-excavation), in the absence of mitigation, were identified at 10 ancient woodland parcels. As a result of these Project commitments impacts associated with five ancient woodlands have been completely. The remaining 5 ancient woodlands (and the associated 15 m buffer) is unavoidable as all proposed works relate to the removal, undergrounding or modification of existing third-party infrastructure (11 kV, 33 kV, 132 kV), with the existing assets already located within the associated woodland or root protection zone. The assessment concluded that out of the remaining ancient woodlands 1 woodland Millers Wood is located within Babergh and Mid Suffolk Local Plan area (Section B and C of the Project route). Millers Wood is partially within the Order Limits for PAR H10-A2, H11-A1 and visibility splay. These PARs makes use of the existing highway. Works consist of management of road-side habitat around Bullen Lane only. Potential for accidental encroachment. A comprehensive explanation of the Project approach to ancient woodland avoidance and minimisation of impact on ancient woodland is detailed in Appendix B: Ancient Woodland and Veteran Tree Strategy (document reference 7.4.B) On point 2 (b) ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9) assesses impacts to geology and sites of geological value. Further detailed information on the anticipated superficial geology within the Order Limits of the Project is contained within ES

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		Appendix 9.1: Baseline Information and Preliminary Contamination Risk Assessment (document reference 6.9.A1). The assessment concludes that during the construction of the Project, there could be physical disturbance and therefore damage to or loss of Sites of Geological Importance. However, Sites of Geological Importance have not been identified within the Order Limits where construction activities are proposed to take place. While Sites of Geological Importance have been identified within the Study Area, construction activities and therefore physical ground disturbance is not anticipated, within the boundary of the Sites of Geological Importance, and therefore there is no potential for damage to or loss of these sites. In relation to point 2 (e) as part of the stakeholder engagement Babergh and Mid Suffolk District Council (see Draft Statement of Common Ground Babergh and Mid Suffolk (document reference 5.9.6)) noted that the Project is indicating a -6% BNG for area habitat units and that they expect the mandatory 10% BNG to be achieved through off-site measures. National Grid has taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver achieve a minimum of 10% Biodiversity Net Gain. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1). Although there is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required

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LP17 Landscape	1. “To conserve and enhance landscape character development must: a. Integrate with the existing landscape character of the area and reinforce the local distinctiveness and identity of individual settlements; b. Be sensitive to the landscape and visual amenity impacts (including on dark skies and tranquil areas) on the natural environment and built character; and c. Consider the topographical cumulative impact on landscape sensitivity. 2. Where significant landscape or visual impacts are likely to occur, a Landscape and Visual Appraisal (LVA) or a Landscape and Visual Impact Assessment (LVIA) must be prepared to identify ways of avoiding, reducing and mitigating any adverse effects and opportunities for enhancement”.	The full assessment of the potential residual effects of the Project on landscape and visual amenity is contained in ES Chapter 13: Landscape and Visual (document reference 6.13) and ES Appendix 13.2: Landscape Baseline and Assessment (document reference 6.13.A2), ES Appendix 13.3: Visual Baseline and Assessment (document reference 6.13.A3) and ES Appendix 13.4: Residential Visual Amenity Assessment (document reference 6.13.A4). The landscape and visual amenity assessments indicate that the construction phases would result in significant negative landscape and visual amenity effects during construction. These significant effects are related to the introduction of construction activity and equipment, including the loss of some landscape features including farmland and field boundary vegetation. At Year 15 of operation, following the maturation of mitigation planting, the assessment concludes that significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure projects, as set out in Paragraphs 5.10.5 and 5.10.13 of NPS EN-1. Whilst adverse landscape and visual effects are anticipated, it is considered that there are exceptional circumstances to justify the Project in the Dedham Vale National Landscape and it has been demonstrated that the Project is critical to the delivery of clean power, and therefore in the public interest. The SoCG with Babergh and Mid Suffolk District Council (Draft Statement of Common Ground Babergh and Mid Suffolk (document reference 5.9.6)) details the local planning authority’s concerns around the number of viewpoints included in the Landscape and Visual Impact

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		Assessment and the methodology for assessing the value of view. An approach to compensation is needed, not just mitigation, where and how it has been identified and described, how the applicant has sought engagement from the local authority on this issue. The matter of views remains under discussion.
LP18 Area of Outstanding Natural Beauty	"1. Proposals for major development within the AONBs will be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest… 3. Development within the AONB Project Areas should have regard to the relevant Valued Landscape Assessment".	Point 1 and 3 of this policy are relevant to the Project. In relation to Point 1, ES Appendix 13.5: National Landscape Assessment Study (document reference 6.13.A5) has been produced to support ES Chapter 13: Landscape and Visual (document reference 6.13) of the ES. The northern half of the Dedham Vale National Landscape is within the Babergh and Mid Suffolk District (within Suffolk). National Landscapes are shown on ES Figure 13.1: LVIA Study Area and Landscape Designations (document reference 6.13.F1). The Project would be undergrounded through Dedham Vale National Landscape and adjacent landscapes. A CSE compound would be located to the east of Raydon Great Wood, approximately 2 km to the north-east of the National Landscape at its closest point. The Project would then transition back to overhead line, heading north away from the National Landscape. To the south-east of Dedham Vale National Landscape, the underground cable route would continue outside the National Landscape and terminate at a new substation known as the EACN Substation, approximately 1.3 km south of the National Landscape. ES Chapter 13: Landscape and Visual (document reference 6.13) identifies the potential for major and significant effects during the construction phase as a result of the removal of some landscape features including grazing marsh along the River Stour and field boundary hedgerows and the introduction of cranes required temporarily to construct the

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		pylons. The assessment of effects during operation (and maintenance) concludes that minor and not significant effects (negative) would be experienced once the underground cable has been installation and the underground corridor reinstated. In accordance with Point 1 the Project is a national infrastructure project of public interest therefore the Project's location within the AONB (National Landscape) is considered to constitute exceptional circumstances. The Planning Statement (document reference 5.6) sets out the need for the Project in particular the need for significant reinforcements both in the form of new substations and transmission circuits to provide connections for these new customers and to ensure that power can be transferred securely to the onshore demand centres to meet the needs of electricity consumers in Britain. National Grid's has a duty to seek to further the purpose of the Dedham Vale National Landscape, which is to 'conserve and enhance natural beauty' in accordance with section 85 of the Countryside and Rights of Way Act 2000 (CRoW Act). This duty was introduced in 2023 and strengthens the previous version of section 85 of the CRoW Act which required relevant authorities to 'have regard' to the statutory purpose of National Landscapes. National Grid has prepared a report: National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) (document reference 5.10) submitted with this application for development consent, which sets out how National Grid has taken the National Landscape into consideration through all stages of the Project design and identified potential additional measures which would deliver enhancements for one or more of the special qualities and natural beauty indicators and help to support delivery of the Dedham Vale National Landscape

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		and the Dedham Vale AONB and Stour Valley Project Area Management Plan 2021-2026. In relation to Point 3, Section 6.5 of ES Chapter 13: Landscape and Visual (document reference 6.13) outlines that the Project has had regard to the Joint Babergh and Mid Suffolk District Council Landscape Guidance and several publications on the Dedham Vale AONB and Stour Valley.
LP19 The Historic Environment	1. "Where an application potentially affects heritage assets, the Councils will require the applicant to submit a heritage statement that describes the significance of any heritage asset that is affected including any contribution made by their setting. The level of detail should be proportionate to the asset's importance and sufficient to understand the potential impact. 2. In addition, where an application potentially affects heritage assets of archaeological interest, the heritage statement must: a) Include an appropriate desk-based assessment and, where necessary, a field evaluation by a suitably qualified person; and b) If relevant, demonstrate how preservation in situ of those archaeological assets can be achieved through the design of the development and safeguarding during construction... 4. In order to safeguard and enhance the historic environment, the Councils will have regard (or special regard consistent with the Councils' statutory duties) where appropriate to the historic environment and take account of the contribution any designated or non-designated heritage assets make to the character	ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets (document reference 6.11.A7) found that the Project would not result in substantial harm to any heritage assets. Chapter 11: Historic Environment (document reference 6.11) concludes that within Section B (Mid Suffolk) the Project would result in a medium adverse impact resulting in a permanent moderate adverse significance (significant) impact to 11 designated assets and 8 non-designated assets and due to change in setting. In Section C (Babergh District) the Project would result in significant permanent impacts to 1 designated assets and 8 non-designated assets. This impact would be at the lower end of the spectrum of less than substantial harm. Whilst

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	of the area and its sense of place. All designated and non-designated heritage assets must be preserved, enhanced or conserved in accordance with statutory tests and their significance, including consideration of any contribution made to that significance by their setting. 5. When considering applications where a level of harm is identified to heritage assets (including historic landscapes) the Councils will consider the extent of harm and significance of the asset in accordance with the relevant national policies. Harm to designated heritage assets (regardless of the level of harm) will require clear and convincing justification in line with the tests in the National Planning Policy Framework. 6. Proposals which potentially affect heritage assets should have regard to all relevant Historic England Advice and Guidance. 7. Where development is otherwise considered acceptable, planning conditions/obligations will be used to secure appropriate mitigation measures and if appropriate a programme of archaeological investigation, recording, reporting, archiving, publication, and community involvement; to advance public understanding of the significance of any heritage assets to be lost (wholly or in part); and to make this evidence and any archive generated publicly accessible".	the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. The substantial public benefits and need for the Project, as set out in the Planning Statement (document reference 5.6) including supporting the UK's net zero target, enabling the connection in East Anglia of new low carbon energy generation, and reinforcing the transmission network clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage assets of scheduled quality. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. The local authority did not agree with the value assigned to heritage assets, in particular Grade II listed building. The method is still under discussion (Draft Statement of Common Ground Babergh and Mid Suffolk (document reference 5.9.6)).
LP23 Sustainable Construction and Design	1. "All new development is required to minimise its dependence on fossil fuels and to make the fullest contribution to the mitigation of climate change through adopting a sustainable approach to energy use…	Points 1 and 3 of this policy are considered relevant to the Project. In relation to Point (1) the Project would support the UK's net zero target to achieve net zero emissions by 2050 through the connection in East Anglia of new low carbon energy generation, and by reinforcing the transmission

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	3. In meeting the above, all major developments are required to submit a Sustainability Design and Construction Statement. This should be submitted at the appropriate stage in the application process and demonstrate how the principles set out in 2c)-2h) will be incorporated into the design of the development…".	network. A Greenhouse Gas Assessment (ES Appendix 4.1, document reference 6.4.A1) has been prepared in support of the Project. This identifies the carbon dioxide equivalent emissions that would be released during the construction and operation of the Project. The assessment concludes that the construction and operational CO2e numbers are not considered to have a material impact on the ability of the Government to meet its carbon reduction targets and therefore are not significant. Therefore, the operational, medium to long term benefits of delivering the Project on a national level are considered to outweigh any short-term impacts of greenhouse gas (GHG) emissions because of material use and construction activities. In accordance with Point (3) the Project is supported by an Outline Site Waste Management Plan – Appendix B of the CoCP (document reference 7.2) which sets out project-specific measures that will be employed to reduce the consumption of raw materials and to use the mitigation hierarchy for waste as part of reducing waste sent to landfill.
LP27 Flood Risk and Vulnerability	"Proposals for new development can be approved where: 1. The Strategic Flood Risk Assessment, as a starting point, has been used to assess whether the proposal is at risk of flooding and any impact of the proposal on flood risk. Other available flooding evidence should also be considered where it is relevant and/or is more up to date; 2. In areas at medium or high risk from flooding, it has been soundly demonstrated that the new development or intensification of development, can be made safe for its lifetime without increasing flooding elsewhere. This includes addressing the 'sequential	The Flood Risk Assessment (FRA) (document reference 7.9) has been submitted as part of the application for development consent focussing on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) concludes that the parts of the Project which are located in Babergh and Mid Suffolk Local Plan area (Sections B and C of the Project route) are mostly located in Flood Zone 1, this includes new pylons, the two CSE compounds and the extension to Bramford Substation.

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	test'; where needed the 'exception test' and also a site-specific flood risk assessment; 3. Mitigation is provided against existing and potential flood risks throughout the life of the development (including fluvial, pluvial, tidal and sewer flooding) through application of a sequential approach to flood risk within the design and layout of the site, the implementation of Sustainable Drainage Systems (SuDS), and avoiding or mitigating risks to ground or surface water quality; 4. Above ground, appropriate SuDS are incorporated within new developments unless it can be demonstrated that ground conditions are unsuitable for such measures, and take these opportunities to provide multifunctional benefits, including biodiversity, landscape, amenity and water quality enhancement (but excluding public open space); 5. Details appropriate to the scale of development are provided regarding how on-site surface water drainage will be managed so as to not cause or increase flooding elsewhere. This includes taking account of the cumulative impact of minor developments; 6. Opportunities to provide betterment of greenfield runoff rates to reduce the overall risk of flooding, have been provided wherever possible; 7. In circumstances requiring surface water management measures (including rain water harvesting), adequate mitigation which removes any increased flood risks and/or detrimental impacts are provided to support any planning application to the satisfaction of the Lead Local Flood Authority;	The Risk of Flooding from the Surface Water map (Environment Agency, 2025) shows that the majority of land within Sections B and C is at very low risk of surface water flooding. As shown in the FRA (document reference 7.9), where there are interactions between the Project and the high-risk zone during construction, these are mostly where temporary haul roads, pylon and cable construction working areas are proposed. The proposed works at Bramford Substation would be located within the catchment area for the River Gipping. The substation extension at Bramford is located in Flood Zone 1. A sequential approach has been taken in siting the Project. Detail on the Sequential and Exception Test are provided in Sections 5.1 and 5.2 of the FRA (document reference 7.9) submitted as part of the application for development consent. The Project is classified as 'essential infrastructure' with respect to flooding vulnerability in the NPPF. The CSE compound, which represent the parts of the Project that are most vulnerable to flooding, are situated in Flood Zone 1, satisfying the Sequential Test. Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures. These measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk. As addressed in the FRA (document reference 7.9), there are three pylons proposed in fluvial floodplains in Section B and no pylons in Section C. The CSE compound site at Little Wenham is partially situated in Flood Zone 3 following the release of updated flood mapping dataset from the Environment Agency. This CSE compound would be laid out in accordance with the

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	8. Further indicative details of long-term maintenance, management and where appropriate adoption by an appropriate body are provided at application stage; and 9. There is no unacceptable impact upon areas identified as vulnerable to coastal erosion".	sequential approach, whereby the most vulnerable components are located in areas at lowest risk of flooding. The requirements for compensation of loss of floodplain storage associated with these pylons is addressed in the following sub-section and secured by commitment W17 in the Outline CoCP (document reference 7.2). During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the FRA. Above ground structures such as pylons and below ground structures such as the underground cable are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. In relation to point (4) the Outline CoCP (document reference 7.2) describes the flood practice measures including SuDS for managing surface water flood risk that would be adopted. To comply with point (6) the sites where cables and the CSE compounds is proposed on currently undeveloped land the flow restriction from the developed site shall be based on the estimated greenfield run-off rate (Qbar10 or 1 in 1 year event) for the undeveloped sites. In line with guidance from the Lead Local Flood Authorities (LLFA), the flow restriction from the developed site shall be based on the estimated 'greenfield' run-off rate for the undeveloped site, limited to a maximum rate of 2 l/s/ha. The FRA (document reference 7.9) contains further details on 'greenfield' run-off rates.
LP29 Safe, Sustainable	"1) All developments will be required to demonstrate safe and suitable access for all and must prioritise sustainable and active transport and maximise the	In relation to Point (1), Appendix B Outline Construction Worker Travel Plan of the Outline Construction Traffic Management Plan (CTMP) (document reference 7.3B)

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and Active Transport	opportunities to utilise these modes in accordance with the transport hierarchy. Where possible, active travel is to be tied in with the green infrastructure network to support net environmental gains… 2) Development will be expected to contribute to the delivery of sustainable transport strategies for managing the cumulative impacts of growth, whilst protecting and enhancing the Public Rights of Way network. 3) All development should be informed by the relevant parking guidance, with adequate access for servicing and emergency vehicles. 4) Where necessary, development will be expected to provide home to school transport contributions. 5) Development proposals that are expected to, or likely to cause a significant increase in transport movements must: a) Be supported by a transport statement and if appropriate a transport assessment; and b) Provide a travel plan informed by the relevant Count/National Guidance to mitigate the highway impact of development and maximise sustainable transport modes. 6) Significant impacts on highway safety or the function of the highway network must be mitigated. Impact on highway safety must not be unacceptable and the residual cumulative impacts on the road network must not be severe".	contains the Travel Plan, setting out the good practice measures that will be in place to encourage sustainable transportation for the workforce, in a way that reduces both environmental and social impacts on the local area. The objective of the Travel Plan is to encourage a reduction in the quantity of single-occupancy car journeys and to create a shift towards more sustainable modes of transport. On points 2, 5 and 6, ES Chapter 16: Traffic and Transport (document reference 6.16) and ES Chapter 17: Cumulative Effects (document reference 6.17) identifies other developments which together with the Project could result in a cumulative impact to the highway network. The Transport Assessment (document reference 7.11) assesses the potential for disruption to infrastructure during construction. The Project is expected to generate very low-level vehicle movements during operational and maintenance phase therefore operational effects to the transport network have been scoped out of the assessment. As with all major infrastructure projects, construction of the Project will require the use of additional vehicles, although these will be low in any given month and will also be spread across the extent of the Order Limits, to limit the effect in any geographical area. The Outline CoCP (document reference 7.2) contains a list of embedded, standard and additional mitigation measures and environmental commitments relating to air quality. Embedded mitigation measures comprise of the inclusion of a largely continuous haul road to be used by construction vehicles reducing construction traffic on the local road network. As a result of all measures introduced, there are not predicted to be any significant adverse traffic and transport effects.

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		The Outline PRoW Management Plan (document reference 7.5) provides a list of each of the affected PRoWs and the proposed management proposals. The Project is not expected to result in any permanent closures or diversions of footways or the cycle network as a result of the construction activities of the Project. A limited number of temporary diversions and crossing points are required for PRoW affected by the construction of the Project. The Outline Public Rights of Way (PRoW) Management Plan (document reference 7.6) explains the details of the temporary short-term diversions and appropriate measures for the management of PRoW during the various stages of the Project. The assessment in ES Chapter 16: Traffic and Transport (document reference 6.16) concluded that a short term neutral or minor adverse effect is expected on all PRoW from pedestrian, cyclist and horse-rider delays, and overall these are therefore expected to be not significant. The assessment also concludes that with mitigation measures, no significant adverse effects on sensitive receptors including PRoW, and on the use and safety of the road network, are anticipated during construction. Details of the strategy for PRoWs and the management regimes can be found within the Outline PRoW Management Plan (document reference 7.6). In relation to point 3, ES Chapter 16: Traffic and Transport (document reference 6.16) sets out the parking provision that will be provided during the construction phase, noting that the operational phase impacts have been scoped out of the assessment.
Policy LP30 - Managing	1. “Planning proposals will need to have regard to the Councils’ Infrastructure Delivery Plan (a living document that will be reviewed and updated during	In relation to Point (1) regard has been had for the Babergh and Mid Suffolk Infrastructure Delivery Plan (2019 – 2036). The Project complies with the Infrastructure Delivery Plan

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Infrastructure Provision	the plan period) and any responses to the proposals from infrastructure providers. All new development must be supported by, and have good access to, all necessary infrastructure. Planning permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet the necessary infrastructure requirements arising from the proposed development. 2. Development proposals must consider all of the infrastructure implications of a scheme, including existing commitments to infrastructure provision at the time of application submission and determination, and cumulative impacts if the proposal forms one of a number of growth projects in a locality and/or infrastructure catchment area. 3. Applicants must demonstrate that adequate consideration has been given to the timing and level of infrastructure provision to the satisfaction of the relevant LPA and infrastructure providers. As such, development may need to be phased either spatially or sequentially to ensure the provision of infrastructure in a timely manner. Restrictions on planning permissions and/or planning obligations may be used to secure a satisfactory phasing arrangement".	by ensuring that the new permanent infrastructure located within Babergh and Mid Suffolk Council area (such as the CSE compound and the extension to Bramford Substation) are supported by, and have good access to, all necessary infrastructure. Appendix 4 Traffic and Transport Construction Effects of the ES Chapter 16: Traffic and Transport (document reference 6.16.A4) considers the infrastructure implications of the Project during construction. ES Chapter 16 concludes that there will be no significant impacts to road users associated with the Project. National Grid has also embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction of the Project these include the inclusion of a largely continuous haul road to reduce effects on the local highway network during construction. Construction vehicles will use the haul road to move along the site, reducing construction traffic on the confining traffic. In addition to this standard mitigation measures, comprising effective construction logistics practices, management activities, and techniques, would be implemented during construction of the Project to limit effects through adherence to good site practices and achieving legal compliance. The Outline Code of Construction Practice (CoCP) (document reference 7.2) contains relevant standard mitigation measures relating to Traffic and Transport. With regard to Points (2) and (3) the Traffic and Transport Construction Effects (Document reference 6.16.A4) presents an assessment of the construction effects for all road links forming the Primary Access Route (PAR) during the estimated peak year of construction activity for the

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		Project along with the significance of these effects. This assessment includes those committed developments likely to overlap with the Project peak year of construction and that could generate additional traffic along the PARs. ES Chapter 17: Cumulative Effects (document reference 6.17) also presents an assessment of the Project's construction effects against approved and pending planning application's timing to determine whether there would be a cumulative impact.
Essex County Council Minerals and Waste Local Plan (2014)		
Policy S8 – Safeguarding mineral resources and mineral reserves	"By applying Mineral Safeguarding Areas (MSAs) and/ or Mineral Consultation Areas (MCAs), the Mineral Planning Authority will safeguard mineral resources of national and local importance from surface development that would sterilise a significant economic resource or prejudice the effective working of a permitted mineral reserve, Preferred or Reserve Site allocation within the Minerals Local Plan. The Minerals Planning Authority shall be consulted, and its views taken into account, on proposed developments within MSAs and MCAs except for the excluded development identified in Appendix 5. Mineral Safeguarding Areas Mineral Safeguarding Areas are designated for mineral deposits of sand and gravel, silica sand, chalk, brickearth and brick clay considered to be of national and local importance, as defined on the Policies Map. The Mineral Planning Authority shall be consulted on: a) all planning applications for development on a site located within an MSA that is 5ha or more for sand and gravel, 3ha or more for chalk and greater than 1 dwelling for brickearth or brick clay; and b) any land-use policy, proposal or allocation relating to land within an MSA being considered by the Local Planning Authority for	The Project has sought to avoid direct interactions with existing minerals sites, where possible, as described within ES Appendix 9.2: Qualitative Minerals Resource and Infrastructure Assessment (document reference 6.9.A2). The policies map within the adopted Essex County Council Minerals Local Plan confirms that parts of the Order Limits for the Project are located within a MSA for sand and gravel and brickclay. The Study Area also interacts with some existing minerals sites and the associated Mineral Consultation Areas (MCAs), as shown on ES Figure 9.3: Mineral Safeguarding Areas, Mineral Consultation Areas, and Minerals Infrastructure (document reference 6.9.F3) as discussed in ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9). Information obtained from Essex County Council has provided the locations of the following safeguarded existing minerals infrastructure sites that the Order Limits and Study Area interact with: • Crown Quarry (Section C) • Blixes Farm (Section E) • Bradwell Quarry (Section E)

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	possible development as part of preparing a Local Plan (with regard to the above thresholds). Mineral Consultation Areas MCAs are designated within and up to an area of 250 metres from each safeguarded permitted minerals development and Preferred and Reserve Site allocation as shown on the Policies Map. The Mineral Planning Authority shall be consulted on: a) Any planning application for development on a site located within an MCA except for the excluded development identified in Appendix 5, b) Any land-use policy, proposal or allocation relating to land within an MCA that is being considered as part of preparing a Local Plan Proposals which would unnecessarily sterilise mineral resources or conflict with the effective workings of permitted minerals development, Preferred or Reserve Mineral Site allocation shall be opposed".	• Sheepcotes (Section F) • Roxwell Quarry, Chignall St James (Section F) ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9) concludes that temporary construction impacts on existing minerals infrastructure (very high sensitivity) would be very small. This would result in a minor effect which would be not significant. The operation (and maintenance) impacts on minerals are considered to be very small, based on the assessment presented within the MRIA. For safeguarded minerals resources (medium sensitivity), this would result in a negligible effect which is considered not significant. Essex County Council raised concerns (see Draft Statement of Common Ground Essex County Council (document reference 5.9.3) in relation to sampling techniques used to support the Minerals Impact Assessment (MRA). The MRA should set out the extent that issues of mineral sterilisation have impacted on the final proposed route. The content of the MRA therefore remains under discussion. The ES chapter concludes that discussions with the existing minerals operators are ongoing to agree appropriate mitigation for any potential impacts on these sites.

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Essex and Southend-on-Sea Waste Local Plan (July 2017)		
Policy 2 – Safeguarding Waste Management Sites and Infrastructure	"Where non-waste development is proposed within 250m of safeguarded sites, or within 400m of a Water Recycling Centre, the relevant Local Planning Authority is required to consult the Waste Planning Authority on the proposed non-waste development (except for those developments defined as 'Excluded' in 'Appendix C - Development Excluded from Safeguarding Provisions'). Proposals which are considered to have the potential to adversely impact on the operation of a safeguarded waste site or infrastructure, including the site allocations within this Plan, are unlikely to be opposed where: a. a temporary permission for a waste use has expired, or the waste management use has otherwise ceased and the site or infrastructure is considered unsuitable for a subsequent waste use; or b. redevelopment of the waste site or loss of the waste infrastructure would form part of a strategy or scheme that has wider environmental, social and/or economic benefits that outweigh the retention of the site or the infrastructure for the waste use, and alternative provision is made for the displaced waste use; or c. a suitable replacement site or infrastructure has otherwise been identified and permitted".	National Grid acknowledges that the Project is within a Waste Consultation Area with regard to the following sites: • Ardleigh Highway Depot, • Coggeshall WwTW • Ingatestone WwTW • Shenfield & Hutton WwTW National Grid does not consider that the Project would have an adverse impact on the ongoing operation and maintenance of the above sites. Where there is a potential interface e.g. traffic management, these would be managed through normal interface agreements.
Colchester City Council Local Plan 2013 – 2033: Section 1) (February 2021)		
Policy SP1 – Presumption in Favour of Sustainable Development	"When considering development proposals the Local Planning Authorities will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. They will always work pro-actively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure	The Planning Statement (document reference 5.6) provides an assessment of the Project against the sustainable development objectives for the Planning system set out in the NPPF. The Project is Critical National Priority Infrastructure as defined in National Policy Statement EN-1 and is essential

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	development that improves the economic, social and environmental conditions in the area. Development that complies with the Plan will be approved without delay, unless material considerations indicate otherwise".	to ensure the existing transmission network will have sufficient capacity for the new renewable energy (a substantial proportion of which is generated by offshore wind) that is expected to connect to the network over the next ten years and beyond. The Environmental Statement contains topic chapters (document reference 6.1 – 6.18) which assess the Project's impact on the economic, social and environmental conditions in the area.
Colchester Borough Local Plan: Section 2 2017-2033 (July 2022)		
Policy SP7 – Place Shaping Principles	"All new development must meet high standards of urban and architectural design. Development frameworks, masterplans, design codes, and other design guidance documents will be prepared in consultation with stakeholders where they are needed to support this objective. • All new development should reflect the following place shaping principles, where applicable: • Respond positively to local character and context to preserve and enhance the quality of existing places and their environs… • Provide buildings that exhibit individual architectural quality within well-considered public and private realms; • Protect and enhance assets of historical or natural value… • Incorporate biodiversity creation and enhancement measures… • Include measures to promote environmental sustainability including addressing energy and water efficiency, and provision of appropriate water and	The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce adverse environmental impacts through the process of design development, and by embedding measures into the design of the Project. The Planning Statement (document reference 5.6) explains how good design has been embedded in the project from the outset. The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. The Design Development Report (document reference 5.15) provides an explanation of the main changes in the route alignment and technology following the review and consideration of feedback received to the 2024 statutory consultation and to the targeted statutory and non-statutory consultations held in 2025. A Design and Access Statement (document reference 7.15) has also been produced which summarises National Grid's approach to good design and demonstrates how National Grid has responded to the physical, environmental and socio-economic context of the overhead line route and CSE compound (Great Horksley

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	wastewater and flood mitigation measures including the use of open space to provide flora and fauna rich sustainable drainage solutions; and • Protect the amenity of existing and future residents and users with regard to noise, vibration, smell, loss of light, overbearing and overlooking".	CSE compounds) locations and responded to consultation to define the Project. In accordance with the requirements listed in this policy that are considered to the of relevance the Project will: • Protect the historic environment - In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. ES Chapter 11: Historic Environment (document reference 6.11) found that there would be medium to high adverse magnitude of impacts resulting in a temporary moderate adverse residual effect which is significant, due to changes in settings that affect the value of a number of designated heritage assets in Colchester (referred to as Section D in ES Chapter 11) during the construction phase of the Project. The assessment concludes that far less heritage assets would be impacted by the operational (and maintenance) phase of the Project. • Incorporate biodiversity creation and enhancement measures - National Grid has taken opportunities to provide mitigation and enhancement measures within the Order limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1). There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect

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		of infrastructure projects for which development consent is required. • Provision of appropriate water and wastewater and flood mitigation measures - During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the FRA (document reference 7.9). Above ground structures such as pylons and below ground structures such as the underground cable are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. The Outline CoCP (document reference 7.2) describes the good practice measures including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime. • Protect the amenity of existing and future residents and users - Impacts of the Project on environmental conditions and neighbouring uses including approved development likely to come forward in the future is assessed in the ES Chapters and the associated assessment reports, see ES Chapter 7: Air Quality (document reference 6.7), ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9), ES Chapter 10: Health and Wellbeing (document reference 6.10), ES Chapter 12: Hydrology and Land Drainage (document reference 6.12), ES Chapter 13:

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		Landscape and Visual (document reference 6.13), ES Chapter 14: Noise and Vibration (document reference 6.14), ES Chapter 16: Traffic and Transport (document reference 6.16), ES Chapter 17: Cumulative Effects (document reference 6.17). The assessment in the ES chapters has helped to underpin the embedded mitigation and additional mitigation measures needed to minimise significant adverse effects on the environment. The measures are set out in the Outline CoCP (document reference 7.2) which, amongst other matters, provides measures for the control and reduction of impacts relating to noise, vibration, smell, loss of light, overbearing and overlooking
Policy ENV1: Environment	"The Local Planning Authority will conserve and enhance Colchester's natural and historic environment, countryside and coastline. The Local Planning Authority will safeguard the Borough's biodiversity, geology, history and archaeology, which help define the landscape character of the Borough, through the protection and enhancement of sites of international, national, regional and local importance. The Local Planning Authority will require development to be in compliance with, and contribute positively towards, delivering the aims and objectives of the Anglian River Basin Management Plan. A. Designated sites Development proposals that have adverse effects on the integrity of habitats sites, Sites of Special Scientific Interest or significant adverse impacts on the special qualities of the Dedham Vale Area of Outstanding Natural Beauty (including its setting) (either alone or in-combination) will not be supported. C. Biodiversity and geodiversity	The Project accords with this policy as set out below, where the relevant sub-parts of this policy are identified. Criterion (B) is not relevant to the Project as the Project's Order Limits do not interact with Essex Coast RAMS. In relation to point (A) the Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) presents the assessment of the likely significant ecology and biodiversity effects that could result from the Project. The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction and operation (including maintenance) phases. The assessment of effects on Dedham Vale National Landscape is presented in ES

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	Development proposals where the principal objective is to conserve or enhance biodiversity and geodiversity interests will be supported in principle. For all proposals, development will only be supported where it: i. Is supported with appropriate ecological surveys where necessary; and ii. Where there is reason to suspect the presence of a protected species (and impact to), or Species/Habitats of Principal Importance, applications should be accompanied by an ecological survey assessing their presence and, if present, the proposal must be sensitive to, and make provision for their needs and demonstrate the mitigation hierarchy has been followed; and iii. Will conserve or enhance the biodiversity value of greenfield and brownfield sites and minimise fragmentation of habitats; and iv. Maximises opportunities for the preservation, restoration, enhancement and connection of natural habitats in accordance with the UK and Essex Biodiversity Action Plans or future replacements; and v. Incorporates beneficial biodiversity conservation features, measurable biodiversity net gain of at least 10% in line with the principles outlined in the Natural England Biodiversity Metric, and habitat creation where appropriate. Proposals for development that would cause significant direct or indirect adverse harm to nationally designated sites or other designated areas, protected species, Habitats and Species of Principle Importance, will not be permitted unless:	Appendix 13.5: National Landscape Assessment Study (document reference 6.13.A5). The setting study is included in Annex A: Dedham Vale National Landscape Setting Study. Undergrounding is proposed in four locations, including through the Dedham Vale National Landscape and part of its setting as an embedded mitigation measure to minimise impacts on its setting, as set out in ES Chapter 13: Landscape and Visual (document reference 6.13). With regards to point C (v) and (iii) the Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. Colchester Council have expressed concern around the potential impacts on landscape of the Colne Valley landscape including Open Access Land and Essex Way which they consider are understated. The Project line needs undergrounding or realigning. They also express concern around the extent of viewpoints included in the landscape and visual assessment. Discussions with Colchester Council are on these matters – see Colchester Council Draft Statement of Common Ground (document reference 5.9.8). ES Chapter 8: Ecology and Biodiversity (document reference 6.8) presents the assessment of the likely significant ecology and biodiversity effects that could result from the Project. In addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area

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	i. They cannot be located on alternative sites that would cause less harm; and ii. The benefits of the development clearly outweigh the impacts on the features of the site and the wider network of natural habitats; and iii. Satisfactory biodiversity net gain, mitigation, or as a last resort, compensation measures are provided. The Local Planning Authority will take a precautionary approach where insufficient information is provided about avoidance, mitigation and compensation measures and secure mitigation and compensation through planning conditions/obligations where necessary. D. Irreplaceable habitats Proposals that would result in the loss of irreplaceable habitats, such as ancient woodland, Important Hedgerows and veteran trees will not be permitted unless there are wholly exceptional reasons and a suitable compensation strategy, to the satisfaction of the local planning authority, exists. E. Countryside The local planning authority will carefully balance the requirement for new development within the countryside to meet identified development needs in accordance with Colchester's spatial strategy, and to support the vitality of rural communities, whilst ensuring that development does not have an adverse impact on the different roles, the relationship between and separate identities of settlements, valued landscapes, the intrinsic character and beauty of the countryside and visual amenity. The intrinsic character and beauty of the countryside will be recognised and assessed, and development will only be permitted where it would not adversely affect the	through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1). There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) explains how the Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation (including maintenance phases). The Colchester Council Draft Statement of Common Ground (document reference 5.9.8) notes that Colchester Council believe a 20% BNG enhancement would be more appropriate. Discussions on the matter are ongoing. In accordance with point D the Project has been routed as to avoid the loss of irreplaceable habitats where possible. Owing to the size of the Project it has not been possible to completely avoid the loss of irreplaceable habitat therefore an Ancient Woodland and Veteran Tree Strategy Report (Appendix E to the Outline LEMP (document reference 7.4)) has been prepared to support the application for development consent. The Project has been designed in a way which prioritises the retention of vegetation wherever practicable in accordance with good practice measures as outlined within the Outline CoCP (document reference 7.2). Owing to the size of the Project it has not been possible to completely avoid the loss of such natural features. The LEMP (document reference 7.4) sets out the principal measures that are required to help avoid, minimise, mitigate and compensate (where relevant) the impacts to vegetation.

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	intrinsic character and beauty of the countryside and complies with other relevant policies. Within valued landscapes, development will only be permitted where it would not impact upon and would protect and enhance the factors that contribute to valued landscapes".	In relation to Ancient Woodlands, the physical extent of each ancient woodland along the Project has been mapped based on a combination of aerial imagery and based on information obtained from the ground truthing woodland surveys. Table 8.23 in ES Chapter 8: Ecology and Biodiversity (document reference 6.7) lists the Ancient Woodlands identified within a 200m of the Project's Order Limits and identifies the proposed mitigation measure/commitment. The location and further information relating to all Ancient Woodlands is presented within Appendix 8.1: Habitats Report and presented on Figure A8.1.3: Ancient Woodland Locations (document reference 6.8.A1). In addition, the Project has considered 11 woodlands to be Ancient Woodland within ES Chapter 8: Ecology and Biodiversity (document reference 6.8) due to the Local Wildlife Site citations mentioning these woodlands support ancient woodland features. These woodlands have therefore been included in the impact assessment as Ancient Woodland. Potential impacts (excavation and non-excavation), in the absence of mitigation, were identified at 10 ancient woodland parcels. As a result of these Project commitments impacts associated with five ancient woodlands have been completely. The remaining 5 ancient woodlands (and the associated 15 m buffer) is unavoidable as all proposed works relate to the removal, undergrounding or modification of existing third-party infrastructure (11 kV, 33 kV, 132 kV), with the existing assets already located within the associated woodland or root protection zone. None of the remaining ancient woodlands are located within Colchester (Section D of the Project route) therefore the Project will not impact any ancient woodlands. A comprehensive explanation of the Project approach to ancient woodland avoidance and

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		minimisation of impact on ancient woodland is detailed in Appendix B: Ancient Woodland and Veteran Tree Strategy (document reference 7.4.B) With regard to veteran trees, Appendix B: Ancient Woodland and Veteran Tree Strategy (document reference 7.4.B) outlines the veteran trees within the study area (Order Limits plus up to 30m)) shows the location of veteran trees. Annex D lists the veteran trees within the Study Area and identifies the assumed mitigation. The Ancient Woodland and Veteran Tree Strategy Report states that based on the existing overhead line alignments without considering the LoD this is an initial assessment of veteran tree removals and impacts and all attempts should be made during detailed design to retain veteran trees where practicable (see commitment B18 in the CoCP (document reference 7.2). Ancient Woodland and Veteran Tree Strategy Report details the management outcomes for veteran trees. The final mitigation measures, remediation works and long-term monitoring are to be agreed at detailed design stage with the Project arboriculturist and the relevant landowners on a case-by-case basis. All management options discussed for veteran trees need to be achievable and therefore will need landowner consent and agreement with National Grid. Protection measures are to be in place prior to the commencement of construction or pre-construction works and require sign off by the Project Arboriculturist. With regard to Important Hedgerows, ES Chapter 8: Ecology and Biodiversity (document reference 6.8) concludes that there would be both temporary and permanent loss within the Order Limits of the Project. The hedgerows that would be lost on a temporary basis would be reinstated in line with the habitat reinstatement principles set out in the Outline LEMP (document reference

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		7.4). Mitigation for the permanent loss of hedgerows would be delivered through the creation/ enhancement of habitat associated with achieving a minimum of 10% biodiversity net gain for the Project. Following the application of mitigation, it is concluded that there would be an overall negligible magnitude of impact with no significance residual effect on Important Hedgerows. ES Chapter 11: Historic Environment (document reference 6.11) assesses the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. Mitigation measures to reduce impacts on archaeology are set out in the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (WSI) (document reference 7.5) and includes preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction. Colchester City Council have made comments around the survey methods and the scope of surveys for species outside the remit of Natural England. See Draft Statement of Common Ground with Colchester (document reference 5.9.8).
Policy ENV3: Green Infrastructure	“The Local Planning Authority will aim to protect, enhance and deliver a comprehensive green infrastructure network comprising strategic green links between the rural hinterland, urban Colchester, river	Due to the rural nature of the Project there is little scope to create green links between the environmental areas proposed as part of the Project and existing green infrastructure networks.

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	corridors and open spaces across the Borough. It will seek to protect and enhance the existing network of green and blue infrastructure features and to secure the delivery of new green infrastructure where deficiencies and gaps are identified that will benefit communities, wildlife and the environment… Proposals that cause loss or harm to the green infrastructure network will not be permitted unless the need for and benefits of the development outweigh any adverse impacts. Where adverse impacts on green infrastructure are unavoidable, development will only be permitted if suitable mitigation measures for the network are provided. Key linkages will be constructed to a suitable standard to allow year-round secure usage by all. The Local Planning Authority will seek contributions or require work to be undertaken as part of new development where appropriate, to create new paths where gaps are evident in the existing green infrastructure network/Orbital routes or to enhance the quality of the existing route...".	A landscape strategy has been prepared for the Environmental Area at the CSE compound within Colchester City Council which provides a collaborative approach to delivering landscape and biodiversity mitigation (Outline Landscape and Ecological Management Plan (document reference 7.4)) as secured by Schedule 3 of the draft DCO (document reference 3.1). This landscape strategy has been developed in recognition of the local landscape policies and landscape character, considering the opportunities for local landscape and biodiversity enhancements. It has been developed as part of the iterative process of design and assessment. An Open Space Assessment has been prepared and reported in Appendix B Open Space Assessment of the Planning Statement (document reference 5.6). Open Space is defined in National Policy Statement EN-1 as including green and blue infrastructure. The Project has sought to avoid areas of open space, including green and blue infrastructure. The Project does interact with the Fordham Hall Estate which is a Woodland Trust site and includes a network of 19 km of unsurfaced paths for public use. Much of the site is subject to third-party grazing licences. Whilst public access is permissible on this land, visitors are only allowed to deviate from paths where the land is occupied by the Woodland Trust. Pylons TB48 and TB49 are located within the site, however, these are located on areas of the site where third-party grazing licences exist and these are located away from pathways on the site, with the nearest located approximately 40 metres to the south of pylon TB49. Therefore, there would not be an impact on the use or function of the open space at Fordham Hall Estate. TB46 is within an area of the estate which is not farmed and within land leased by the Woodland Trust. Therefore, as a precautionary approach it has been assumed that the

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		area around TB46 is publicly accessible. Notwithstanding this, whilst it is considered that the positioning of the pylons within the Fordham Hall Estate will not result in the loss of public space as defined in EN-1, Colchester Borough Council Open Space Report (April 2023) identifies a surplus of open space both within the locality of Fordham Hall Estate and within the wider Colchester area.
Policy ENV4: Dedham Vale Area of Outstanding Natural Beauty	"Development will only be supported in or on land within the setting of the Dedham Vale Area of Outstanding Natural Beauty (AONB) that: i. Makes a positive contribution to the natural beauty and special qualities of the AONB, including tranquillity and the AONB's good quality night/dark skies; and, ii. Does not adversely affect the character, quality views, into and out of the AONB and distinctiveness of the AONB or threaten public enjoyment of these areas, including by increased motorised vehicle movement; and, iii. That there are no adverse impacts on the setting of the AONB which cannot reasonably be mitigated against and, iv. Supports the wider environmental, social and economic objectives as set out in the Dedham Vale AONB and Stour Valley Management Plan. Applications for major development within or in close proximity to the boundary of the Dedham Vale AONB will be refused unless in exceptional circumstances it can be demonstrated that the development is in the public interest, and this outweighs other material considerations.	ES Appendix 13.5 National Landscape Assessment Study (document reference 6.13.A5) has been produced to support ES Chapter 13: Landscape and Visual (document reference 6.13). The southern half of the Dedham Vale National Landscape is within Colchester Borough (within Essex). National Landscapes are shown on ES Figure 13.1: LVIA Study Area and Landscape Designations (document reference 6.13.F1). In accordance with the policy, the Project would be undergrounded through Dedham Vale National Landscape and adjacent landscapes. Further information about undergrounding is provided in the Design Development Report (document reference 5.15) and Consultation Report (document reference 5.1A and B) ES Chapter 13: Landscape and Visual (document reference 6.13) identifies the potential for major and significant effects during the construction phase however these would reduce to minor and not significant effects during operation once the underground cables are covered over and land use and landcover reinstated as far as possible. In accordance with the policy, the Project is a national infrastructure project of public interest therefore the Project's location within the National Landscape is considered to constitute exceptional circumstances. The Planning Statement (document reference 5.6) sets out the need for the Project in particular the need for significant

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	Where exceptional development is suitable, landscape enhancements, mitigation or compensation measures must be provided. The Local Planning Authority will seek opportunities to mitigate the impact of features identified as having adverse impacts. Residual impacts may be offset by other planning gain within the AONB or contributions to the Stour Valley Environment Fund... The Local Planning Authority will also encourage proposals in or near the AONB to underground new infrastructure associated with electricity schemes or communication equipment where financially viable, to help protect its landscape qualities".	reinforcements both in the form of new substations and transmission circuits to provide connections for these new customers and to ensure that power can be transferred securely to the onshore demand centres to meet the needs of electricity consumers in Britain. The Project provides opportunity for green infrastructure by providing mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. Although there is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required the Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1).
Policy ENV5: Pollution and Contaminated Land	"Proposals will be supported that will not result in an unacceptable risk to public health or safety, the environment, general amenity, or existing uses due to the potential of air pollution, noise nuisance, surface / ground water sources or land pollution. Proposals for developments within designated Air Quality Management Areas (AQMAs) or where development within a nearby locality may impact on an AQMA are required, first, to be located in such a way as to reduce emissions overall, and secondly to reduce the direct impacts of those developments. Applicants shall, prepare and submit with their application a relevant assessment, taking into account guidance current at the time of the application, which must be to the satisfaction of the Local Planning Authority. Permission will only be granted	ES Chapter 14: Noise and Vibration (document reference 6.14) presents the assessment of the likely significant noise and vibration effects that could result from the construction of the Project. The Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects in accordance with Paragraph 4.1.5 of NPS EN-1. The assessment concluded with the relevant standard mitigation measures and best practicable means (BPM) set out in Appendix F: Outline Noise and Vibration Management Plan to the Outline CoCP (document reference 7.2) relating to noise and vibration the residual effect of construction noise will not be significant to all nearby NSRs during both daytime and nighttime periods. Further detailed construction noise and vibration assessments will be

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	where the Council is satisfied that after selection of appropriate mitigation the development, alone and cumulatively, will not have an unacceptable significant impact on air quality, health and well-being. Development proposals on contaminated land, or where there is reason to suspect contamination, must include an assessment of the extent of contamination and any possible risks. The onus is on the applicant to demonstrate that there is no likely risk to health or the environment due to contamination. Where planning permission is granted, conditions may be imposed requiring the execution of any necessary remedial works. Where a site is affected by land contamination, responsibility for securing a safe development rests with the developer and/or landowner, who will be required to carry out the above. After remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990".	undertaken by the main works contractor(s) prior to commencing works. Operational noise from overhead lines is scoped out of the ES, in accordance with the Scoping Opinion (document reference 6.20), on the basis that a low noise conductor system is proposed. However, additional information regarding operational noise impacts from the overhead lines is provided for information in and ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) (document reference 6.14.A5) respectively. The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. ES Chapter 7: Air Quality (document reference 6.7) assesses the likely air quality effects that would result from the Project and considers the existing baseline conditions and the likely changes and effects to air quality levels during the construction phase. As set out in the Scoping Report (document reference 6.19) and agreed within the Scoping Opinion (document reference 6.20), the operational phase of the Project will not result in any significant impacts to air quality and no further assessment has been carried out in the ES. AQMAs and Air Quality Action Plans prepared by the local planning authority have been taken into consideration as a part of the ES assessment. The assessment confirms that with the implementation of the proposed standard mitigation measures, the effects of construction on air quality in regard to dust soiling, and human health effects are anticipated to be not significant. ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9) considers land

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		contamination and is supported by a Preliminary Contamination Risk Assessment (PRA) (ES Appendix 9.1: Baseline Information and Preliminary Contamination Risk Assessment (document reference 6.9.A1)). The PRA has identified a generally 'very low/low risk' of significant existing contamination to be present within most of the Order Limits. A worst case 'very high' risk has been identified within small discrete sections of the Order Limits. One site has been identified in the Colchester City Council area and assessed as presenting a potential Moderate or above risk to sensitive receptors from existing contamination. Prior to construction, these sites will be individually investigated and assessed in accordance with Land Contamination Risk Management (Environment Agency, 2023)) to determine any additional mitigation measures or remediation requirements. The nature and scope of any mitigation or remediation would be agreed with the Environment Agency and Local Authority (as appropriate). Standard mitigation measures within the Outline CoCP (document reference 7.2) will be adopted during construction to deal with unexpected land contamination.
Policy CC1: Climate Change	"Colchester Borough Council made a Climate Emergency declaration in 2019. A Climate Challenge and Sustainability Strategy and a Carbon Management Plan will support the Climate Emergency Action Plan and will set out detailed specific carbon reduction projects. In addressing the move to a low carbon future for Colchester, the Local Planning Authority will plan for new development in locations and ways that reduce greenhouse gas emissions, adopt the principles set out in the energy hierarchy and provide resilience to the impacts of a changing climate…	The need for the Project is to support the connection and transfer of green, renewable energy into the NETS network. The Project would support the UK's net zero target to achieve net zero emissions by 2050 through the connection in East Anglia of new low carbon energy generation, and by reinforcing the transmission network. A Greenhouse Gas Assessment (ES Appendix 4.1, document reference 6.4.A1) has been prepared in support of the Project. This identifies the carbon dioxide equivalent emissions that would be released during the construction and operation of the Project. The assessment concludes that the construction

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	i. Encouraging design and construction techniques which contribute to climate change mitigation and adaptation by using landform, layout, building orientation, massing, tree planting and landscaping to minimise energy consumption and provide resilience to a changing climate. – Canopy Cover Assessment will be required for all major application. Development proposals should seek where appropriate to increase the level of canopy cover on site by a minimum of 10%. In circumstances, where this is not possible or desirable, compensatory provision should be identified and secured through a legal obligation. – Minimising waste and improving reuse and recycling rates. ii. Development will be directed to locations with the least impact on flooding or water resources. All development should consider the impact of and promotion of design responses to flood risk for the lifetime of the development and the availability of water and wastewater infrastructure for the lifetime of the development. Green infrastructure should be used to manage and enhance existing habitats. Opportunities should be taken to create new habitats and assist with species migration. Consideration should be given to the use of green infrastructure to provide shade during higher temperatures and for flood mitigation. The potential role of green infrastructure as 'productive landscapes' should also be considered".	and operational CO2e numbers are not considered to have a material impact on the ability of the Government to meet its carbon reduction targets and therefore are not significant. Therefore, the operational, medium to long term benefits of delivering the Project on a national level are considered to outweigh any short-term impacts of greenhouse gas (GHG) emissions because of material use and construction activities. The Project will aim to increase canopy cover by committing to a 3:1 replacement for individual trees and individual trees within small groups, see details in the Outline LEMP (document reference 7.4). The tree replanting will be in accordance with the following site selection principles: • Within the Order Limits (on-site landscape mitigation) • Where possible, trees will be replanted in the same, or in close proximity to, the location from which they were removed • If constraints preclude tree planting in the same or in close proximity to where they were removed, tree planting will be undertaken as close as possible to the original location • Outside the Order Limits (off-site landscape compensation) • If it is not possible to replant the trees within the Order Limits, then offsite provision will be provided. Details of the onsite tree planting will be provided in accordance with the final LEMP secured under Requirement 4 (if provided within the Environmental Areas) or the Reinstatement Planting Plan secured under Requirement 9 (as appropriate) of the draft DCO (document reference 3.1).

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		Site waste shall be managed in a structured and auditable manner in accordance with the agreed Outline Site Waste Management Plan (Appendix B of the CoCP (document reference 7.2)), from the commencement of the Project, during the detailed design stage and through construction. This ensures that the aim of waste minimisation is emphasised from the outset. In addition, it would ensure that the waste produced during the construction phase is dealt with in accordance with the relevant requirements of UK legislation, as well as any other requirements specified by the relevant regulatory authorities. The Project directs development to locations with the least impact on flooding or water resources. The FRA (document reference 7.9) submitted as part of the application for development consent focusses on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. A sequential approach has been taken in siting the Project. The majority of the Project lies within Flood Zone 1 and in zones that are at low risk of flooding from other sources. ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) states that the parts of the Project which lie in Colchester City Council area (Section D of the route) is mostly located in Flood Zone 1, these comprise of pylons and one CSE compound. Additionally, the FRA concludes that there are no pylons proposed in the floodplain in Section D. The FRA has concluded that the Project during its construction would be generally at low risk of flooding from rivers. Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures. These measures would also protect construction workers, limit damages to

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		construction equipment and materials and also limit any impacts of the Project on fluvial flood risk. During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the FRA. Above ground structures such as pylons and below ground structures such as the underground cable are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. With regards to green infrastructure a landscape strategy has been prepared for the Environmental Areas including at the CSE compound at Great Horkesley which provides a collaborative approach to delivering landscape and biodiversity mitigation (Outline Landscape and Ecological Management Plan (document reference 7.4)) as secured by Schedule 3 of the draft DCO (document reference 3.1). This landscape strategy has been developed in recognition of the local landscape policies and landscape character, considering the opportunities for local landscape and biodiversity enhancements. It has been developed as part of the iterative process of design and assessment.
Policy PP1: Generic Infrastructure and Mitigation Requirements	"In addition to site specific requirements identified in relevant policies, all proposals will be required to make contributions to the cost of infrastructure improvements and/or community facilities, including education, as required and supported by up-to-date evidence from appropriate sources including the Infrastructure Delivery Plan (IDP), Parish/Town Council, or specially commissioned work. Contributions will be secured to an appropriate level by way of legal agreement or through CIL as required.	The Project is a National Significant Infrastructure Project and is exempt from developer contributions/CIL, this part of the policy is therefore not applicable. The Outline CoCP (document reference 7.2) describes the good practice measures including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for

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	In addition, proposals must, as relevant, address all of the following Borough wide requirements: i. Adequate wastewater treatment, water supply network enhancements, and sewage infrastructure enhancements for the relevant catchment area; ii. Appropriate SuDS for managing surface water runoff within the overall design and layout of the site; iii. Proportionate mitigation for area-wide transport issues as identified in the policies for North, East, South and West Colchester contained in the 'Places' section of the plan; iv. Safe pedestrian access from the site to existing footways to enhance connectivity; v. Suitable design and screening/landscaping to minimise any negative impact on the surrounding landscape and/or heritage assets; vi. Potential archaeological significance of the site as required, by way of predetermination evaluation (geophysical survey and trial trenching). Any findings from the evaluation will need to be reflected in a detailed mitigation strategy for further investigation to be agreed and submitted with the application to preserve in-situ or adequately recorded by excavation, secured by a planning condition; and Further to Section 1 Policy SP2, developments will be required to contribute towards mitigation measures in accordance with the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy 2018-2038 (RAMS)".	the Project's lifetime. The FRA (document reference 7.9) states that access roads and haul roads, as well as areas where impermeable material will be installed in areas where heavy equipment would be used, will also have suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff appropriate to local conditions. Appendix C of the FRA (document reference 7.9) contains further details on SuDS. The Project is expected to generate very low-level vehicle movements during operational and maintenance phase therefore operational effects to the transport network have been scoped out of the assessment. The conclusions presented in ES Chapter 16: Traffic and Transport (document reference 6.16) demonstrate that with mitigation measures, the assessment of traffic generated during construction and operation (including maintenance) of the Project will not result in significant adverse effects on road users, equestrians, walkers, cyclists and horse riders and road links in terms of delay, severance, amenity, fear and intimidation, accidents and road safety, and parking and loading. Embedded mitigation measures comprise of the inclusion of a largely continuous haul road to be used by construction vehicles reducing construction traffic on the local road network. As with all major infrastructure projects, construction of the Project will require the use of additional vehicles, although these will be low in any given month and will also be spread across the extent of the Order Limits, to limit the effect in any geographical area. The Outline CoCP (document reference 7.2) contains a list of embedded, standard and additional mitigation measures and environmental commitments relating to air quality. With the good practice measures in place, no significant effects on air quality are anticipated. Embedded mitigation measures comprise of

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		the inclusion of a largely continuous haul road to be used by construction vehicles reducing construction traffic on the local road network. ES Chapter 16: Traffic and Transport (document reference 6.16) concluded that with mitigation measures, no significant adverse effects on sensitive receptors including PRoW, and on the use and safety of the road network, are anticipated during construction. In relation to point (v) ES Chapter 3: Alternatives (document reference 6.3) sets out how the Project had regard for landscape character and important landscape features during the design optioneering process. ES Chapter 13: Landscape and Visual (document reference 6.13) presents the results of the Landscape and Visual Impact Assessment (LVIA) that has been undertaken on the Project and identifies how screening will be incorporated into the landscape design to minimise negative impact on the surrounding landscape and/or heritage assets. The Outline LEMP (document reference 7.4) outlines the proposals for landscaping on the Project, including the landscape reinstatement plans. With regard to point (vi) Archaeology, ES Chapter 11: Historic Environment (document reference 6.11) report, assesses the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets.

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		Mitigation measures to reduce impacts on archaeology are set out in the Archaeological Mitigation Strategy and Outline WSI (document reference 7.5) and includes preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction.
Policy SS2: Boxted	"All development proposals in Boxted parish will be determined against and be required to comply with policies in the Boxted Neighbourhood Plan and any relevant Local Plan policies".	Within Boxted Neighbourhood plan area the Project proposes a number of pylons, overhead line infrastructure and a CSE compound. The policies relevant to the Project are therefore Policy LC2: Protection of Landscape Character and Policy SM1: loss of visual amenity/unacceptable noise impact from Commercial activity. ES Chapter 13: Landscape and Visual (document reference 6.13) assesses the likely significant landscape and visual effects of the Project. It outlines the baseline conditions (Section 13.5) of landscape character and visual aspects, referencing specific project sections. Within the Boxted Neighbourhood Plan area, relevant viewpoints include VP4.36, VP4.19, VP4.02, and VP4.18. Visual receptors are grouped into Visual Receptor Areas (VRAs) based on location, landscape characteristics, and similar views, as detailed in ES Figure 13.7: Visual Receptors and Viewpoints (document reference 6.13.F7). VRAs and representative viewpoints were determined through site surveys, desktop analysis, and Neighbourhood Plans. The assessment follows GLVIA3 guidelines, using representative viewpoints to capture typical views for linear developments like overhead lines. While significant views were considered, individual assessments for each identified location are not presented in the Landscape and Visual Impact Assessment (LVIA). Regarding noise and vibration, ES Chapter 14: Noise and Vibration (document reference 6.14) evaluates the likely

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		significant effects arising from the construction and operation of the Project. The Project design adheres to the mitigation hierarchy to avoid or reduce noise and vibration impacts, in line with Paragraph 4.1.5 of NPS EN-1.
Policy SS11: Marks Tey	"Growth within the Marks Tey area will largely be guided by the following documents in addition to this Local Plan: The Marks Tey Neighbourhood Plan will provide flexibility, including the scope for the allocation of any small parcels of land for development to be considered in the Neighbourhood Plan at the appropriate time. The Anderson's site is allocated as a Local Economic Area as shown on the Policies Map. This policy should be read in conjunction with the generic Neighbourhood Planning policy SG8".	The Project proposes three pylons and overhead line infrastructure within the Marks Tey Neighbourhood Plan area. The Project has no interaction with the Anderson's employment site (Policy MT15 Anderson employment site and former By-Pass Nurseries site). Within Marks Tey Neighbourhood plan, policies relevant to the Project are Policy MT05 – Local Character and Design, Policy MT06 – Landscape Character, Views and Setting, Policy MT07 Non-designated Heritage Assets, Policy MT10 Protecting and Enhancing the Quality and Quantity of our Green Infrastructure and Policy MT11 – Protecting and Enhancing our Natural Environment. The Project has been designed to align with the mitigation hierarchy, embedding good design principles to avoid, reduce, or mitigate adverse effects on the environment, biodiversity, and cultural heritage. Design Approach: The Project is routed through Character Area 1: Little Tey, with design considerations embedded in accordance with the 'criteria for good design for Energy Infrastructure' outlined in EN-1 (Part 4.7). Design details are provided in ES Chapter 4: Project Description (document reference 6.4) and informed by alternatives considered in ES Chapter 3: Alternatives (document reference 6.3), reflecting National Grid's obligations to be economical, efficient, and safe. The Design Development Report (document reference 5.15), Design and Access Statement (document reference 7.15) and Design Approach for Site Specific Infrastructure (document reference 7.16) outline the design evolution and key decisions.

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		Ecology and Biodiversity: ES Chapter 8: Ecology and Biodiversity (document reference 6.8) assesses the impacts on ecological and biodiversity receptors during construction, operation, and maintenance. Habitat connectivity will be preserved by using existing access routes, minimising working widths, and maintaining green corridors (e.g., hedgerows and watercourses). Hedgerows removed will be reinstated and enhanced where possible to achieve a minimum 10% Biodiversity Net Gain (BNG), as detailed in the Biodiversity Net Gain Report (document reference 7.1). The Project avoids all four Parish Wildlife Sites identified in the Marks Tey Neighbourhood Plan. Landscape and Visual Impact: ES Chapter 13: Landscape and Visual (document reference 6.13) highlights baseline landscape and visual conditions, including visual receptors and views. Viewpoints within the Marks Tey Neighbourhood Plan area are shown in Figure 13.4: Settlements and Infrastructure (document reference 6.13.F4).. Visual effects of linear developments, such as overhead lines, were assessed using representative viewpoints in line with GLVIA3 guidelines. Individual assessments for each viewpoint were not presented in the LVIA. Historic Environment: ES Chapter 11: Historic Environment (document reference 6.11) assesses significant cultural heritage impacts, confirming that the Project avoids direct effects on Listed Buildings or Heritage Assets within the Marks Tey Neighbourhood Plan area. The iterative design process considered policy requirements, historic landscape assessments, and fieldwork to minimise harm. While Church Lane, a locally valued feature, will need to be crossed, existing access points were identified to reduce vegetation removal.

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Policy SS15: West Bergholt	“All development proposals in West Bergholt parish will be determined against and be required to comply with policies in the West Bergholt Neighbourhood Plan and any relevant Local Plan policies”.	Within West Bergholt Neighbourhood plan the Project proposes several pylons and overhead line infrastructure. Policies relevant to the Project are PP3: Open Spaces, Policy PP5: Character Area, Policy PP6: Trees and Hedgerows, Policy PP7: Natural Environment and Policy PP10: Design. The Project has been designed to align with the mitigation hierarchy, embedding principles of good design, environmental responsibility, and efficiency to minimise impacts on open spaces, biodiversity, and visual landscapes. Open Spaces: The Planning Statement (document reference 5.6) confirms no direct interaction between the Project and open spaces identified in the West Bergholt Neighbourhood Plan, including "The Lanes" area, which is remote from the Project. Biodiversity and Environmental Gains: ES Chapter 8: Ecology and Biodiversity (document reference 6.8) assesses the impacts on ecological receptors during construction, operation, and maintenance. Habitat connectivity will be preserved by utilising existing access routes, minimising working widths, and maintaining green corridors such as hedgerows and watercourses. Hedgerows removed will be reinstated and enhanced, aiming for a minimum 10% Biodiversity Net Gain (BNG), as outlined in the Biodiversity Net Gain Report (document reference 7.1). Defunct or species-poor hedgerows will be replanted to achieve species-rich and continuous habitats. Landscape and Visual Assessment: ES Chapter 13: Landscape and Visual (document reference 6.13) provides a detailed assessment, using landscape character information to inform visual impact evaluation. The Project

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		has been designed to minimise visual effects through careful siting and alignment. Design and Efficiency: The Project's design, detailed in ES Chapter 4: Project Description (document reference 6.4) and informed by alternatives in ES Chapter 3: Alternatives (document reference 6.3), reflects National Grid's duty to be economical, efficient, and safe. The siting of the CSE compound, located just outside the West Bergholt Neighbourhood Plan Area, design principles set out in the Design Development Report (document reference 5.15) and Design Approach for Site Specific Infrastructure (document reference 7.16). Good Design Principles: The Planning Statement (document reference 5.6), Design and Access Statement (document reference 7.15) and Design Approach for Site Specific Infrastructure (document reference 7.16) outline how the Project adheres to the "criteria for good design for Energy Infrastructure" in Part 4.7 of EN-1, ensuring that environmental, economic, and aesthetic considerations are embedded throughout the design process.
Policy DM1: Health and Wellbeing	"All development should be designed to help promote healthy and active lifestyles and avoid causing adverse impacts on public health through: iii. Providing appropriate mitigation to avoid harmful emissions… All developments with the potential to cause a deterioration in air quality will be required to provide comply with Policy ENV5... Developments which will have an unacceptable significant adverse impact on health and wellbeing which cannot be mitigated, or that fail to offer reasonable provisions, will not be permitted".	Due to the nature of the Project a large portion of this policy does not apply to the project therefore only the relevant criteria have been included in this assessment. In accordance with criterion (iii) the Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. ES Chapter 7: Air Quality (document reference 6.7) assesses the likely air quality effects that would result from the Project and considers the existing baseline conditions and the likely changes and effects to air quality levels during the

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		construction phase. As set out in the Scoping Report (document reference 6.19) and agreed within the Scoping Opinion (document reference 6.20), the operational phase of the Project will not result in any significant impacts to air quality and no further assessment has been carried out in the ES. The assessment confirms that with the implementation of the proposed standard mitigation measures, the effects of construction on air quality in regard to dust soiling, and human health effects are anticipated to be not significant. ES Chapter 10: Health and Wellbeing (document reference 6.10) details the assessment of the potential residual effects of the Project on Health and Wellbeing. The assessment includes a series of embedded and standard mitigation measures considered as part of the integral environmental appraisal considered from the outset. Section 10.7 of ES Chapter 10 demonstrates that the likely significant effects of the Project can be mitigated through the proposed measures, such to comply with National, Regional and Local Policy. These measures have been informed through the engagement and consultation activities that have taken place with stakeholders, which has helped to provide for a well-informed approach that takes into account local demographics and health considerations.
Policy DM15: Design and Amenity	"All development… must be designed to a high standard, positively respond to its context, achieve good standards of amenity, and demonstrate social, economic and environmental sustainability. Great weight will be given to outstanding or innovative designs which help raise the standard of design more generally in the area. Poor design will be refused including that which fails to take	The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. The Design Development Report (document reference 5.15) provides an explanation of the main changes in the route alignment and technology following the review and consideration of feedback received to the 2024 statutory

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	the opportunity for good design or improving the local area… Ultimately, development proposals must demonstrate that they, and any ancillary activities associated with them, will: i. Respect and, wherever possible, enhance the character of the site, its context and surroundings in terms of its layout, architectural approach, height, scale, form, massing, density, proportions, materials, townscape and/or landscape qualities, and detailed design features. Wherever possible development should positively integrate the existing built environment and other landscape, heritage, biodiversity and arboricultural assets and remove problems as part of the overall development proposal; ii. Help establish a visually attractive sense of place for living, working and visiting, through good architecture and landscaping; iii. Promote and sustain an appropriate mix and density of uses which are well located and integrated, optimise the efficient use of land (including sharing), contribute to inclusive communities, and support retail centres and sustainable transport networks… V. Protect and promote public and residential amenity, particularly with regard to privacy, overlooking, security, noise and disturbance, pollution (including light and odour pollution), daylight and sunlight… VII. Minimise energy consumption/emissions and promote sustainable drainage, particularly with regard to transport, landform, layout, building	consultation and to the targeted statutory and non-statutory consultations held in 2025. A Design and Access Statement (document reference 7.15) and Design Approach for Site Specific Infrastructure (document reference 7.16) have also been produced sets out a summary of National Grid's approach to good design and demonstrates how National Grid has responded to the physical, environmental and socio-economic context of the overhead line route and CSE compound and substation locations and responded to consultation to define the Project. The Design Development Report (document reference 5.15), Design and Access Statement (document reference 7.15) and Design Approach for Site Specific Infrastructure (document reference 7.16) and Design and Access Statement should be read alongside both ES Chapter 3: Alternatives (document reference 6.3), which documents the key environmental factors in consideration of the alternatives, and Chapter 5 of the Planning Statement (document reference 5.6) which explains how planning policy, as well as the requirements of the Electricity Act and the principles of the Holford and Horlock Rules, have influenced the optioneering and design evolution process. The latter demonstrating how such policy and legislative objectives have been embedded into the design of the Project. With regard to public amenity, impacts to residential amenity as a result of the Project are considered in ES Appendix 13.4: Residential Visual Amenity Assessment (document reference 6.13.A4). The assessment concluded that most residential properties within the Study Area of 200 m would not be detrimentally affected by the Project. In some instances; however, a high visual change of a high magnitude would be experienced therefore mitigation

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	orientation, massing, tree planting and landscaping; iv. Incorporate any necessary infrastructure and services including utilities, recycling and waste facilities to meet current collection requirements, highways and parking. This should be sensitively integrated to promote successful place-making v. Provide a network of green infrastructure, open space and landscape as part of the design of the development to reflect the importance of these networks to biodiversity, climate change mitigation, healthy living and creating beautiful places".	measures have been recommended to reduce effects on these properties. In relation to noise and disturbance ES Chapter 14: Noise and Vibration (document reference 6.14) presents the assessment of the likely significant noise and vibration effects that could result from the construction of the Project. The Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects in accordance with Paragraph 4.1.5 of NPS EN-1. The assessment concluded with the relevant standard mitigation measures and best practicable means (BPM) set out in Appendix F: Outline Noise and Vibration Management Plan to the Outline CoCP (document reference 7.2) relating to noise and vibration the residual effect of construction noise will not be significant to all nearby NSRs during both daytime and nighttime periods. Further detailed construction noise and vibration assessments will be undertaken by the main works contractor(s) prior to commencing works. Operational noise from overhead lines is scoped out of the ES, in accordance with the Scoping Opinion (document reference 6.20), on the basis that a low noise conductor system is proposed. However, additional information regarding operational noise impacts from the overhead lines provided for information in ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) (document reference 6.14.A5). With regard to point (v) on light pollution ES Chapter 13: Landscape and Visual (document reference 6.13) presents the assessment of likely significant landscape and visual effects that could result from the Project including lighting impacts. The assessment has been based on the assumption that:

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		All works associated with substation - exterior and interior lighting would be provided at the site to allow for safe movement and the operation of equipment. All lighting would be designed in accordance with the appropriate design standards and be motion-sensor activated. A typical construction day will consist of 12-hours meaning in winter this would require working in the dark at either end of the day. For the purposes of the ES, it is therefore assumed that winter working will require lighting at certain sites but will not be wide scale across the Project. The Outline CoCP (document reference 7.2) sets out the good practice measures to protect Landscape and Visual environments during construction and operation. Key measures include directional and minimised construction lighting (LV03), locating potentially disruptive activities and equipment away from sensitive receptors like residential areas where practicable (GG22), designing permanent lighting to minimise impacts on adjacent properties (GG31), and ensuring construction lighting is switched off when not in use and positioned to avoid spillover onto nearby land (B06). The need for the Project is to support the connection and transfer of green, renewable energy into the NETS network. The Project would support the UK's net zero target to achieve net zero emissions by 2050 through the connection in East Anglia of new low carbon energy generation, and by reinforcing the transmission network. A Greenhouse Gas Assessment (ES Appendix 4.1, document reference 6.4.A1) has been prepared in support of the Project. This identifies the carbon dioxide equivalent emissions that would be released during the construction and operation of the Project. The assessment concludes that the construction and operational CO2e numbers are not considered to have

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		a material impact on the ability of the Government to meet its carbon reduction targets and therefore are not significant. Therefore, the operational, medium to long term benefits of delivering the Project on a national level are considered to outweigh any short-term impacts of greenhouse gas (GHG) emissions because of material use and construction activities. In accordance with national policy requirements, the Project has been designed following the mitigation hierarchy. At the routeing and siting stage, the Project design process was informed by the Holford and Horlock Rules to avoid impacts where possible. These established guidelines informed the evaluation criteria and how the mitigation hierarchy was applied during the options selection process. Both sets of rules have been deployed by National Grid and have formed an important part of developing the preferred route and design of the Project. For example, the route seeks to avoid siting infrastructure in areas with significant amenity value; the most direct route is preferred to avoid the need for additional angle pylons; siting infrastructure in areas benefiting from existing advantageous vegetation screening is preferred; and densely populated urban/residential areas are avoided, where possible. Essentially the Project's route alignment has been selected because it performed more strongly overall than any other options, having regard to these factors (amongst others) and national planning policy. In relation to green infrastructure, a landscape strategy has been prepared for the Environmental Area at the EACN substation in Tendring Council which provides a collaborative approach to delivering landscape and biodiversity mitigation (Outline Landscape and Ecological Management Plan (document reference 7.4)) as secured by Schedule 3 of the draft DCO (document reference 3.1). This landscape strategy has been developed in recognition

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		of the local landscape policies and landscape character, considering the opportunities for local landscape and biodiversity enhancements. It has been developed as part of the iterative process of design and assessment.
Policy DM16: Historic Environment	"Development that will lead to substantial harm to or total loss of significance of a listed building, conservation area, historic park or garden or important archaeological remains (including the setting of heritage assets) will only be permitted in exceptional circumstances where the harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss. Where development will lead to less than substantial harm this harm should be weighed against the public benefits of the proposal. Development affecting the historic environment should seek to conserve and enhance the significance of the heritage asset and any features of specific historic, archaeological, architectural or artistic interest. In all cases there will be an expectation that any new development will enhance the historic environment or better reveal the significance of the heritage asset unless there are no identifiable opportunities available. In instances where existing features have a negative impact on the historic environment, as identified through character appraisals (or other method of identification of historic assets), the Local Planning Authority will request the removal of the features that undermine the historic environment as part of any proposed development. The Local Planning Authority will request the provision of creative and accessible interpretations of heritage assets impacted by development. Conservation of the historic environment will also be ensured by:	ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets (document reference 6.11.A7) found that the Project would not result in substantial harm to any heritage assets. Chapter 11: Historic Environment (document reference 6.11) concludes that within Colchester City Council the project would result in permanent adverse magnitude of impact to 11 designated assets, 1 conservation area, and 7 non-designated heritage assets due to a change in setting but this impact would be at the lower end of the spectrum of less than substantial harm. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. The substantial public benefits and need for the Project, as set out in Chapter 5 of the Planning Statement (document reference 5.6), including supporting the UK's net zero

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	i. Identifying, characterising, protecting and enhancing Conservation Areas; ii. Protection and enhancement of existing buildings and built areas which do not have Listed Building or Conservation Area status but have a particular local importance or character which it is desirable to keep; iii. Preserving and enhancing Listed Buildings, Scheduled Monuments, Historic Parks and Gardens, including their respective settings, and other features, which contribute to the heritage of the Borough; and iv. Sites of archaeological interest will be clearly identified and protected, and sites that become known, whether through formal evaluation as part of a Planning Application or otherwise, will similarly be protected according to their importance. Heritage Impact Assessments and/or Archaeological Evaluations will be required for proposals related to or impacting on the setting of heritage assets and/or known or possible archaeological sites, and where there is potential for encountering archaeological sites so that sufficient information is provided to assess the significance of the heritage assets and to assess the impacts of development on historic assets together with any proposed mitigation measures".	target, enabling the connection in East Anglia of new low carbon energy generation, and reinforcing the transmission network clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage assets of scheduled quality. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Colchester City Council have raised concerns around the assessment methodology in regards to non-designated heritage assets and there are still concerns that not all non-designated heritage assets have been included in the assessment. This topic is therefore under discussion. See Draft Statement of Common Ground with Colchester City Council (document reference 5.9.8) for more details.
Policy DM17 – Retention of Open Space and Recreation Facilities	"The Council will protect and enhance the existing network of green links and open spaces and secure additional areas where deficiencies are identified. The provision of public open space in developments should be informed by an appraisal of local context and community need and up to date evidence, with a particular regard to the impact of site development on biodiversity.	The Project has sought to avoid areas of open space, including green and blue infrastructure, where possible. However, on occasion it is necessary for the overhead line to pass through open space to avoid settlements and conflicts with other developments. An Open Space Assessment has been prepared and reported in Appendix B Open Space Assessment of the Planning Statement (document reference 5.6) Open Space

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	A) Development, including change of use, of any existing or proposed public or private open space, including allotments, will not be supported unless it can be demonstrated that: i. Alternative and improved provision will be created in a location well related to the functional requirements of the relocated use and its existing and future users; and The proposal would not result in the loss of an area important for its amenity or contribution to the green infrastructure network or to the character of the area in general; and ii. It achieves the aims of any relevant prevailing strategy relating to open space and recreation. B) Development proposals resulting in a loss of open space must additionally demonstrate that: i. There is an identified excess provision within the catchment of the facility and no likely shortfall is expected within the plan period; or ii. Alternative and improved provision will be supplied in a location well related to the functional requirements of the relocated use and its existing and future users. In all cases, development will not be permitted that would result in any deficiencies in public open space requirements or increase existing deficiencies in the area either at the time of the proposal or be likely to result in a shortfall within the plan period. iii. Additionally, development that would result in the loss of any small incidental areas of open space, not specifically identified on the policies map but which contribute to amenity value and the	is defined in National Policy Statement EN-1 as including green and blue infrastructure.. The findings of the assessment are included in Appendix B of the Planning Statement (document reference 5.6). Table B.1 of the Open Space Assessment found there are 14 areas of open space including 4 angling locations within or adjacent to the Order Limits within Colchester City Local Plan area. There will be no material impact on the function or use of the five areas adjacent to the Order limits. Of those sites within the Order limits, two are lakes that are currently used for angling and where the Project will prevent angling in the future. However, alternative facilities are available in the area and the loss of these sites for angling is outweighed by the positive benefits of the Project. The Project has no impact on the use or function of the majority of the remaining sites located within the Order limits. It is noted that one of the sites – Ardleigh Show Ground – is a Minerals site and the Project takes the approved restoration scheme into account. As reported in response to Policy ENV3: Green Infrastructure the Project does interact with the Fordham Hall Estate which is a Woodland Trust site and includes a network of 19 km of unsurfaced paths for public use. Much of the site is subject to third-party grazing licences. Whilst public access is permissible on this land, visitors are only allowed to deviate from paths where the land is occupied by the Woodland Trust. Pylons TB48 and TB49 are located within the site, however, these are located on areas of the site where third-party grazing licences exist and these are located away from pathways on the site, with the nearest located approximately 40 metres to the south of pylon TB49. Therefore, there would not be an impact on the use or function of the open space at Fordham Hall Estate.

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	character of existing residential neighbourhoods, and any registered common, heathland or village green or which contribute to green infrastructure will not be permitted. The proposal would not result in the loss of an area important for its amenity or contribution to the green infrastructure network or to the character of the area in general; and iv. It achieves the aims of any relevant prevailing strategy relating to open space and recreation. B) Development proposals resulting in a loss of open space must additionally demonstrate that: iii. There is an identified excess provision within the catchment of the facility and no likely shortfall is expected within the plan period; or iv. Alternative and improved provision will be supplied in a location well related to the functional requirements of the relocated use and its existing and future users. In all cases, development will not be permitted that would result in any deficiencies in public open space requirements or increase existing deficiencies in the area either at the time of the proposal or be likely to result in a shortfall within the plan period. Additionally, development that would result in the loss of any small incidental areas of open space, not specifically identified on the policies map but which contribute to amenity value and the character of existing residential neighbourhoods, and any registered common, heathland or village green or which contribute to green infrastructure will not be permitted".	TB46 is within an area of the estate which is not farmed and within land leased by the Woodland Trust. Therefore, as a precautionary approach it has been assumed that the area around TB46 is publicly accessible. Notwithstanding this, whilst it is considered that the positioning of the pylons within the Fordham Hall Estate will not result in the loss of public space as defined in EN-1, Colchester Borough Council Open Space Report (April 2023) identifies a surplus of open space both within the locality of Fordham Hall Estate and within the wider Colchester area.

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Policy DM20: Promoting Sustainable Transport and Changing Travel Behaviour	"The Local Planning Authority will work with developers and other partners to increase modal shift towards sustainable modes by improving accessibility of development through the promotion of walking and cycling as an integral part of development, and by further improving public transport. In line with policy SG1 (Spatial Strategy), development that reduces the need to travel will be encouraged and sustainable transport will be improved to provide better connections between communities and their needs. This will be achieved by: i. Safeguarding existing and proposed routes for walking, cycling and public transport, including rapid transit, park and ride, and green infrastructure, from development. New development will be expected to contribute towards maintaining continuity and enhancing these connections where appropriate… ii. The Local Planning Authority will also work with partners to accommodate necessary car travel making the best use of the existing network and managing the demand for road traffic. The Local Planning Authority will support improvements to the strategic road, rail and cycle network where appropriate evidence is provided and local consultation undertaken. Improvements will be made to the road network to support sustainable development and to reduce the impact of congestion. The demand for car travel will be managed to prevent adverse impacts on sustainable transportation, air quality, safety, local amenity and built character… iii. Encouraging a reduction in through traffic in the town centre to encourage trips to be undertaken by more sustainable modes;	Only criterion (i), (iv), (vi) and (vii) are relevant to the Project. The other criteria have not been included in the assessment. Appendix B Outline Construction Worker Travel Plan of the Outline Construction Traffic Management Plan (CTMP) (document reference 7.3) contains the Travel Plan, setting out the good practice measures that will be in place to encourage sustainable transportation for the workforce, in a way that reduces both environmental and social impacts on the local area. The objective of the Travel Plan is to encourage a reduction in the quantity of single-occupancy car journeys and to create a shift towards more sustainable modes of transport. ES Chapter 16: Traffic and Transport (document reference 6.16) and ES Chapter 17: Cumulative Effects (document reference 6.17) identifies other developments which together with the Project could result in a cumulative impact to the highway network. The Transport Assessment (document reference 7.11) assesses the potential for disruption to infrastructure during construction. The Project is expected to generate very low-level vehicle movements during operational and maintenance phase therefore operational effects to the transport network have been scoped out of the assessment. As with all major infrastructure projects, construction of the Project will require the use of additional vehicles, although these will be low in any given month and will also be spread across the extent of the Order Limits, to limit the effect in any geographical area. The Outline CoCP (document reference 7.2) contains a list of embedded, standard and additional mitigation measures and environmental commitments relating to air quality. Embedded mitigation

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	iv. Encouraging use of new technology to better manage traffic, provide alternatives, facilitate the use of ultra-low emission vehicles and reduce the need to travel, particularly at peak times".	measures comprise of the inclusion of a largely continuous haul road to be used by construction vehicles reducing construction traffic on the local road network. As a result of all measures introduced, there are not predicted to be any significant adverse traffic and transport effects. The Outline PRoW Management Plan (document reference 7.6) provides a list of each of the affected PRoWs and the proposed management proposals. The Project is not expected to result in any permanent closures or diversions of footways or the cycle network as a result of the construction activities of the Project. A limited number of temporary diversions and crossing points are required for PRoW affected by the construction of the Project. The Outline Public Rights of Way (PRoW) Management Plan (document reference 7.6) explains the details of the temporary short-term diversions and appropriate measures for the management of PRoW during the various stages of the Project. The assessment in ES Chapter 16: Traffic and Transport (document reference 6.16) concluded that a short term neutral or minor adverse effect is expected on all PRoW from pedestrian, cyclist and horse-rider delays, and overall these are therefore expected to be not significant. The assessment also concludes that with mitigation measures, no significant adverse effects on sensitive receptors including PRoW, and on the use and safety of the road network, are anticipated during construction. Details of the strategy for PRoWs and the management regimes can be found within the Outline PRoW Management Plan (document reference 7.6). ES Chapter 16: Traffic and Transport (document reference 6.16) sets out the parking provision that will be provided

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		during the construction phase, noting that the operational phase impacts have been scoped out of the assessment. The Project has sought to reduce through traffic in town centres by requiring construction staff to travel via defined PARs for construction staff travelling to dedicated construction areas as set out in the Outline CTMP (document reference 7.3). These routes have sought to avoid town centres. Further measures will be adopted during construction to encourage all staff to move away from reliance on single occupancy private car travel, these are set out in Section 5 of the Outline CTMP.
Policy DM23: Flood Risk and Water Management	"The Local Planning Authority will seek to direct development away from land at risk of flooding in accordance with the National Planning Policy Framework and the Planning Practice Guidance. Sites proposed for allocation in the Local Plan have been considered sequentially with respect to flood risk. The Sequential Test will be applied to planning applications for new sites coming forward that have not been allocated through the Plan. Development will only be supported where it can be demonstrated that the proposal meets flood management requirements in the NPPF, the PPG and Policy DM23. Development proposals will be required to deliver or contribute to the delivery of flood defence/protection measures and/or flood mitigation measures to minimise the risk of increased flooding both within the development boundary and off-site in all flood zones and to ensure that the development remains safe throughout the life of the development. Proposals that include measures to enhance the flood resilience of new or	The FRA (document reference 7.9) has been submitted as part of the application for development consent focussing on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. A sequential approach has been taken in siting the Project. The permanent works of the Project which lie in Colchester City Council's area (Section D of the Project route) are mostly located in Flood Zone 1, comprising of pylons and one CSE compound. As addressed in the FRA (document reference 7.9), there are no pylons proposed in the floodplain in Section D. The Risk of Flooding from Surface Water map (Environment Agency, 2025) shows that most of the land within Section D is at very low risk of surface water flooding. As shown in the FRA (document reference 7.9), where there are interactions between the Project and the high-risk zone during construction, these are mostly where temporary haul roads and pylon construction working areas are proposed. The FRA has concluded that the Project during its construction would be generally at low risk of flooding from rivers. Locally higher risks, particularly to temporary works

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	renovated buildings will be encouraged, particularly in areas with a history of local flooding. Where proposals that require planning permission include driveways, hardstanding or paving, the use of permeable materials and landscaping will be sought to minimise the cumulative impacts of flooding from such developments. Developments will also be required to comply with the following as indicated in the Colchester Surface Water Management Plan (or updates if appropriate): i. All developments across the catchment (excluding minor house extensions less than 50m2) which result in a net increase in impermeable area are to include at least one 'at source' SuDS measure e.g., bio-retention planter box, green/brown roofs). This is to help reduce the peak volume of run off discharging from development sites. It is recommended that a SuDS treatment train is utilised to assist in this reduction; ii. All major development proposals are required to reduce post-development runoff rate back to the greenfield 1 in 1 year rate, with an allowance for climate change. On brownfield sites where this is not achievable, then a minimum betterment of 50% should be demonstrated for all flood events. This approach accords with the NPPF/PPG and the most up to date UKCIP guidance). All minor sites should limit discharge rates as much as practical while considering the increased risk of blockage associated with smaller outfall orifice sizing; iii. Developments located in any of the Critical Drainage Areas (CDAs) as defined in Colchester's Surface Water Management Plan or Local Flood Risk Zones	within main river floodplains, would be reduced through embedded and good practice measures. These measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk. Detail on the Sequential and Exception Test are provided in Sections 5.1 and 5.2 of the FRA (document reference 7.9) submitted as part of the application for development consent. The Project is classified as 'essential infrastructure' with respect to flooding vulnerability in the NPPF. The substations represent the parts of the Project that are most vulnerable to flooding, are situated in Flood Zone 1, satisfying the Sequential Test. During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the FRA. Above ground structures such as pylons and below ground structures such as the underground cable are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. In relation to point (ii) where the CSE compound is proposed on currently undeveloped land. The flow restriction from the developed site shall be based on the estimated greenfield run-off rate (Qbar10 or 1 in 1 year event) for the undeveloped sites. In line with guidance from the LLFAs, the flow restriction from the developed site shall be based on the estimated 'greenfield' run-off rate for the undeveloped site, limited to a maximum rate of 2 l/s/ha. The FRA (document reference 7.9) contains further details on 'greenfield' run-off rates.

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	(LFRZs) and redevelopments of more than one property or area greater than 0.1 hectare should seek betterment to a greenfield runoff rate; New developments in Critical Drainage Areas will be required to provide or contribute towards the provision of flood mitigation options via CIL/S106 contributions, identified in the Colchester Surface Water Management Plan, to reduce or mitigate the risk of flooding to existing properties located within the CDA and to accommodate the drainage needs of the new developments".	The Order Limits of the Project avoid encroaching into any Critical Drainage Areas (CDAs) as defined in Colchester's Surface Water Management Plan.
Policy DM24: Sustainable Urban Drainage Systems	"All new residential and commercial development, car parks and hard standings should incorporate Sustainable Drainage Systems (SuDS) appropriate to the nature of the site. Such systems shall provide optimum water runoff rates and volumes taking into account relevant local or national standards; and shall ensure that the quality of runoff is consistent with the requirements of the Water Framework Directive. SuDS design quality will be expected to conform with standards encompassed in the relevant BRE, CIRIA standards and Essex County Council's SuDS Design Guide (and as updated) to the satisfaction of the Lead Local Flood Authority. Surface water should be managed as close to its source as possible and on the surface where practicable to do so through the use of green roofs, rain gardens, soakaways and permeable paving. Maximum use should also be made of low land take drainage measures such as rain water recycling, green roofs, permeable surfaces and water butts. Appropriate pollution control measures should be incorporated as part of SuDS to reduce the risk of pollution. Including through reference to the CIRIA SuDS Manual, it must be ensured that sufficient treatment steps are provided prior to any surface water	The Outline CoCP (document reference 7.2) describes the flood practice measures including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime. The FRA (document reference 7.9) states that access roads and haul roads, as well as areas where impermeable material will be installed in areas where heavy equipment would be used, will also have suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff.

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	discharge. Regard should be given to both the nature of the proposed development and the sensitivity of the receiving water environment. Opportunities should be taken to integrate sustainable drainage within the design of the development, to create amenity space, enhance biodiversity and manage pollution. Existing drainage features such as ditches and ponds should be retained on site where possible as part of SuDS schemes. Only where there is a significant risk of pollution to the water environment, inappropriate soil conditions and/or engineering difficulties, should alternative methods of drainage be considered. It will be necessary to demonstrate why it is not achievable. If alternative methods are to be considered, adequate assessment and justification should be provided and consideration should still be given to pre- and post-runoff rates. SuDS design should be an integral part of design proposals and clear details of proposed SuDS together with how they will be managed and maintained will be required as part of any planning application. Only proposals which clearly demonstrate that a satisfactory SuDS layout with appropriate maintenance is possible, or compelling justification as to why SuDS should not be incorporated into a scheme, or are unviable, are likely to be successful. Contributions in the form of commuted sums may be sought in legal agreements to ensure that the drainage systems can be adequately maintained into the future. The SuDS should be designed to ensure that the maintenance and operation requirements are economically proportionate".	

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Policy DM25 – Renewable Energy, Water, Waste and Recycling	"The Local Planning Authority's commitment to carbon reduction includes the promotion of efficient use of energy and resources, alongside waste minimisation and recycling… The Local Planning Authority will encourage the use of sustainable construction techniques in tandem with high quality design and materials to reduce energy demand, waste and the use of natural resources, including the sustainable management of the Borough's water resources. To help meet waste reduction and recycling targets, the Local Planning Authority will support proposals for sustainable waste management facilities identified in the Waste Management Plan which minimise impacts on the communities living close to the sites (noise, pollution, traffic) and on the local environment and landscape. New developments will be expected to support this objective by employing best practice technology to optimise the opportunities for recycling and minimising waste and by providing better recycling facilities…".	The Outline Site Waste Management Plan (Appendix B of the CoCP (document reference 7.2)) outlines how waste will be dealt with from the commencement of the Project, during the detailed design stage and through construction. This ensures that the aim of waste minimisation is emphasised from the outset. In addition, it would ensure that the waste produced during the construction phase is dealt with in accordance with the relevant requirements of UK legislation, as well as any other requirements specified by the relevant regulatory authorities. The CoCP contains general commitments to help meet waste reduction and recycling targets during the construction phase. The CoCP notes that The Main Works Contractor(s) will prepare a final Site Waste Management Plan (SWMP) which will be maintained and monitored throughout the construction phase and oversee that any sub-contractor(s) adhere to the SWMP. The CoCP also outlines the measures to be adopted to ensure sustainable management of the Borough's water resources.
Tendring District Local Plan 2013-2033 and Beyond: North Essex Authorities' Shared Strategic Section 1 (2021)		
Policy SP1 – Presumption in Favour of Sustainable Development	"When considering development proposals the Local Planning Authorities will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. They will always work pro-actively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.	The Planning Statement (document reference 5.6) provides an assessment of the Project against the sustainable development objectives for the Planning system set out in the NPPF. The Project is Critical National Priority Infrastructure as defined in National Policy Statement EN-1 and is essential to ensure the existing transmission network will have sufficient capacity for the new renewable energy (a substantial proportion of which is generated by offshore wind) that is expected to connect to the network over the next ten years and beyond.

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	Development that complies with the Plan will be approved without delay, unless material considerations indicate otherwise".	The Environmental Statement contains topic chapters (document reference 6.1 – 6.16) which assess the Project's impact on the economic, social and environmental conditions in the area.
Policy SP6: Infrastructure and Connectivity	"All development must be supported by the provision of the infrastructure, services and facilities that are identified to serve the needs arising from the development. The requirements in section A of this policy apply only to the Tendring / Colchester Borders Garden Community, whilst the remaining sections B, C, D and E apply to all allocations and development proposals in the North Essex Authorities area. B. Transportation and Travel The local planning authorities will work with government departments, Highways England, Essex County Council, Network Rail, rail and bus operators, developers and other partners to deliver the following; • Changes in travel behaviour by applying the modal hierarchy and increasing opportunities for sustainable modes of transport that can compete effectively with private vehicles; E. Water & Waste water The local planning authorities will work with Anglian Water, Affinity Water, the Environment Agency and developers to ensure that there is sufficient capacity in the water supply and waste water infrastructure to serve new development. Where necessary, improvements to water infrastructure, waste water treatment and off-site drainage should be made ahead of the occupation of dwellings to ensure compliance with environmental legislation".	A large portion of this policy relates to Tendring/Colchester Borders Garden Community and is not therefore relevant to the Project. Only the sub-parts of the policy outlined in the policy text are relevant to the Project. The Project is expected to generate very low-level vehicle movements during the operational and maintenance phase and therefore operational effects to the transport network have been scoped out of the assessment. The conclusions presented in ES Chapter 16: Traffic and Transports (document reference 6.16) demonstrate that with mitigation measures, the assessment of traffic generated during construction and operation (including maintenance) of the Project will not result in significant adverse effects on road users, equestrians, walkers, cyclists and horse riders and road links in terms of delay, severance, amenity, fear and intimidation, accidents and road safety, and parking and loading. Embedded mitigation measures comprise of the inclusion of a largely continuous haul road to be used by construction vehicles reducing construction traffic on the local road network. As with all major infrastructure projects, construction of the Project will require the use of additional vehicles, although these will be low in any given month and will also be spread across the extent of the Order Limits, to limit the effect in any geographical area. The outline Code of Construction Practice (document reference 7.2) contains a list of embedded, standard and additional mitigation measures and environmental commitments relating to air quality. With the good practice measures in place, no significant effects

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		on air quality are anticipated. Embedded mitigation measures comprise of the inclusion of a largely continuous haul road to be used by construction vehicles reducing construction traffic on the local road network. Chapter 6 of the Outline Construction Traffic Management Plan (CTMP) (document reference 7.3) contains the Travel Plan, setting out the good practice measures that will be in place to encourage sustainable transportation for the workforce, in a way that reduces both environmental and social impacts on the local area. The objective of the Travel Plan is to encourage a reduction in the quantity of single-occupancy car journeys and to create a shift towards more sustainable modes of transport. Chapter 6.16 Traffic and Transport (document reference 6.16) concludes that with mitigation measures, no significant adverse effects on sensitive receptors including PRoW, and on the use and safety of the road network, are anticipated during construction.
SP7 - Place Shaping Principles	"All new development must meet high standards of urban and architectural design. Development frameworks, masterplans, design codes, and other design guidance documents will be prepared in consultation with stakeholders where they are needed to support this objective. a) All new development should reflect the following place shaping principles, where applicable: b) Respond positively to local character and context to preserve and enhance the quality of existing places and their environs; c) Provide buildings that exhibit individual architectural quality within well-considered public and private realms;	The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce adverse environmental impacts through the process of design development, and by embedding measures into the design of the Project. The Planning Statement (document reference 5.6) explains how good design has been embedded in the project from the outset. The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. The Design Development Report (document reference 5.15) provides an explanation of the main changes in the route alignment and technology following the review and consideration of feedback received to the 2024 statutory

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	d) Protect and enhance assets of historical or natural value; e) Incorporate biodiversity creation and enhancement measures; f) Create well-connected places that prioritise the needs of pedestrians, cyclists and public transport services above use of the private car; g) Provide a mix of land uses, services and densities with well-defined public and private spaces to create sustainable well-designed neighbourhoods; h) Enhance the public realm through additional landscaping, street furniture and other distinctive features that help to create a sense of place; i) Provide streets and spaces that are overlooked and active and promote inclusive access; Include parking facilities that are well integrated as part of the overall design and are adaptable if levels of private car ownership fall; j) Provide an integrated and connected network of biodiverse public open space and green and blue infrastructure, thereby helping to alleviate recreational pressure on designated sites; k) Include measures to promote environmental sustainability including addressing energy and water efficiency, and provision of appropriate water and wastewater and flood mitigation measures including the use of open space to provide flora and fauna rich sustainable drainage solutions; and l) Protect the amenity of existing and future residents and users with regard to noise, vibration, smell, loss of light, overbearing and overlooking".	consultation and to the targeted statutory and non-statutory consultations held in 2025. A Design and Access Statement (document reference 7.15) has also been produced which summarises National Grid's approach to good design and demonstrates how National Grid has responded to the physical, environmental and socio-economic context of the overhead line route and CSE compound and substation locations and responded to consultation to define the Project. In accordance with the requirements listed in this policy that are considered to the of relevance the Project will: • Protect the historic environment - In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. ES Chapter 11: Historic Environment (document reference 6.11) found that there would be medium to high adverse magnitude of impacts resulting in a temporary moderate adverse residual effect which is significant, due to changes in settings that affect the value of a number of designated heritage assets in Tendring (referred to as Section C in ES Chapter 11) during the construction phase of the Project. The assessment concludes that far less heritage assets would be impacted by the operational (and maintenance) phase of the Project. • Incorporate biodiversity creation and enhancement measures - National Grid has taken opportunities to provide mitigation and enhancement measures within the Order limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project would

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		deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1). There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required. • Provision of appropriate water and wastewater and flood mitigation measures - During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the FRA (document reference 7.9). Above ground structures such as pylons and below ground structures such as the underground cable are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. The Outline CoCP (document reference 7.2) describes the good practice measures including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime. • Protect the amenity of existing and future residents and users with regard to noise, vibration, smell, loss of light, overbearing and overlooking. Impacts of the Project on environmental conditions and neighbouring uses including approved development likely to come forward

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		in the future is assessed in the ES Chapters and the associated assessment reports, see ES Chapter 7: Air Quality (document reference 6.7), ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9), ES Chapter 10: Health and Wellbeing (document reference 6.10), ES Chapter 12: Hydrology and Land Drainage (document reference 6.12), ES Chapter 13: Landscape and Visual (document reference 6.13), ES Chapter 14: Noise and Vibration (document reference 6.14), ES Chapter 16: Traffic and Transport (document reference 6.16), ES Chapter 17: Cumulative Effects (document reference 6.17). The assessment in the ES chapters has helped to underpin the embedded mitigation and additional mitigation measures needed to minimise significant adverse effects on the environment. The measures are set out in the Outline CoCP (document reference 7.2) which, amongst other matters, provides measures for the control and reduction of impacts relating to noise, vibration, smell, loss of light, overbearing and overlooking.
Tendring District Local Plan 2013-2033 and Beyond: Section 2 (2022)		
SPL3: Sustainable Design	"Part A: Design. All new development (including changes of use) should make a positive contribution to the quality of the local environment and protect or enhance local character. The following criteria must be met: a) new buildings, alterations and structures are well designed and maintain or enhance local character and distinctiveness; b) the development relates well to its site and surroundings particularly in relation to its siting, height, scale, massing, form, design and materials;	The Project accords with this policy as set out below, where the relevant sub-parts of this policy are identified: Part (A) the design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. The Design Development Report (document reference 5.15) provides an explanation of the main changes in the route alignment and technology following the review and consideration of feedback received to the 2024 statutory consultation and to the targeted statutory and non-statutory

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	c) the development respects or enhances local landscape character, views, skylines, landmarks, existing street patterns, open spaces and other locally important features; d) the design and layout of the development maintains or enhances important existing site features of landscape, ecological, heritage or amenity value; and e) boundary treatments and hard and soft landscaping are designed as an integral part of the development reflecting the function and character of the development and its surroundings. The Council will encourage the use of locally distinctive materials and/or locally occurring and characteristic hedge species. Part B: Practical Requirements. New development (including changes of use) must meet practical requirements. The following criteria must be met: a) access to the site is practicable and the highway network will, following any required mitigation, be able to safely accommodate the additional traffic the proposal will generate and not lead to severe traffic impact; b) the design and layout of the development maintains and/or provides safe and convenient access for people with mobility impairments; c) the development incorporates or provides measures to minimise opportunities for crime and anti-social behaviour; d) the applicant/developer can demonstrate how the proposal will minimise the production of greenhouse gases and impact on climate change as per the	consultations held in 2025. A Design and Access Statement (document reference 7.15) and Design Approach for Site Specific Infrastructure (document reference 7.16) has also been produced sets out a summary of National Grid's approach to good design and demonstrates how National Grid has responded to the physical, environmental and socio-economic context of the overhead line route and CSE compound and substation locations and responded to consultation to define the Project. The Design Development Report (document reference 5.15), Design and Access Statement (document reference 7.15) and Design Approach for Site Specific Infrastructure (document reference 7.16) should be read alongside both ES Chapter 3: Alternatives (document reference 6.3), which documents the key environmental factors in consideration of the alternatives, and Chapter 5 of the Planning Statement (document reference 5.6) which explains how planning policy, as well as the requirements of the Electricity Act and the principles of the Holford and Horlock Rules, have influenced the optioneering and design evolution process. The latter demonstrating how such policy and legislative objectives have been embedded into the design of the Project. As stated, regard has been had to the Horlock and Holford rules in respect to the siting of new transmission infrastructure and substations and as described in detail in Chapter 5 of the Planning Statement (document reference 5.6). Both sets of rules have been deployed by National Grid and have formed an important part of developing the preferred route and design of the Project. For example, the route seeks to avoid siting infrastructure in areas with significant amenity value; the most direct route is preferred to avoid the need for additional angle pylons; siting infrastructure in areas benefiting from existing

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	Building Regulations prevailing at the time and policies and requirements in this plan; e) buildings and structures are designed and orientated to ensure adequate daylight, outlook and privacy for future and existing residents; f) provision is made for adequate private amenity space, waste storage and recycling facilities, vehicle and cycle parking; and g) the development reduces flood risk and integrates sustainable drainage within the development, creating amenity and enhancing biodiversity. Part C: Impacts and Compatibility. New development (including changes of use) should be compatible with surrounding uses and minimise any adverse environmental impacts. The following criteria must be met: a) the development will not have a materially damaging impact on the privacy, daylight or other amenities of occupiers of nearby properties; b) the development, including any additional road traffic arising, will not have unacceptable levels of pollution on: air, land, water (including ground water), amenity, health or safety through noise, smell, dust, light, heat, vibration, fumes or other forms of pollution or nuisance; c) the health, safety or amenity of any occupants or users of the proposed development will not be materially harmed by any pollution from an existing or committed use; and d) all new development should have regard to the most up to date adopted Essex Mineral Local Plan; and	advantageous vegetation screening is preferred; and densely populated urban/residential areas are avoided, where possible. Essentially the Project's route alignment has been selected because it performed more strongly overall than any other options, having regard to these factors (amongst others) and national planning policy. Part B - With regard to practical requirements, given the Project is an infrastructure project its layout is largely governed by operational requirements. The Design Approach for Site Specific Infrastructure (DASSI) explains the background to the project and the overview of the operational requirement for permanent infrastructure such as EACN Substation, and modifications to overhead lines. With regard to Part B (g) permanent infrastructure will mostly be sited in low-risk flood areas (Flood Zone 1) satisfying the Sequential Test. Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures, as concluded in ES Chapter 12: Hydrology and Land Drainage (document reference 6.12). The Project will use SUDS to reduce flood risk associated with the increase in permeable area resulting from the Project, see details on drainage measures in Outline CoCP (document reference 7.2). In relation to Part C the impacts of the Project on environmental conditions and neighbouring uses including approved development likely to come forward in the future is assessed in the ES Chapters and the associated assessment reports, see ES Chapter 7: Air Quality (document reference 6.7), ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9), ES Chapter 10: Health and Wellbeing (document reference 6.10), ES Chapter 12: Hydrology and Land Drainage (document reference 6.12), ES Chapter 13:

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	e) during the construction phase, developers must comply with a 'considerate constructors' scheme' which employs reasonable measures and techniques to minimise and mitigate impacts and disturbance to neighbours and the existing wider community and any damage to public and private property".	Landscape and Visual (document reference 6.13), ES Chapter 14: Noise and Vibration (document reference 6.14), ES Chapter 16: Traffic and Transport (document reference 6.16), ES Chapter 17: Cumulative Effects (document reference 6.17). The assessment in the ES chapters has helped to underpin the embedded mitigation and additional mitigation measures needed to minimise significant adverse effects on the environment. The measures are set out in the Outline CoCP (document reference 7.2) which, amongst other matters, provides measures for the control of pollution of air, land, water (including ground water) pollution; and amenity, health or safety, noise, smell, dust, light, vibration, fumes or other forms of pollution or nuisance. Part C (d) - The Order Limits have been identified to cross a limited number of existing mineral extraction sites (with a very high sensitivity). One of these is Crown Quary which is located in Tendring (Essex County) as shown in Figure 9.3: Mineral Safeguarding Areas, Mineral Consultation Areas, and Minerals Infrastructure (document reference 6.9.F3).
HP3: Green Infrastructure	"Green Infrastructure will be used as a way of adapting to, and mitigating the effects of, climate change, through the management and enhancement of existing spaces and habitats and the creation of new spaces and habitats, helping to provide shade during higher temperatures, flood mitigation and benefits to biodiversity, along with increased access. All new development must be designed to include and protect and enhance existing Green Infrastructure in the local area, as appropriate.	An Open Space Assessment has been prepared and reported in Section Appendix B Open Space Assessment of the Planning Statement (document reference 5.6). Open Space is defined in National Policy Statement EN-1 as including green and blue infrastructure. The Project has sought to avoid areas of open space, including green and blue infrastructure. With regard to the loss of vegetation, The Project will deliver a minimum of 10% Biodiversity Net Gain. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report

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	Green Infrastructure as identified on the Policy Map, will be protected, managed and where necessary enhanced by: a) managing development to secure a net gain in green infrastructure; b) supporting investment priority projects set out in the Green Infrastructure Delivery Plan; c) not permitting development that compromises the integrity of the overall Green Infrastructure networks; d) investing in enhancement and restoration where opportunities exist; and e) using developer contributions to facilitate improvements to their quality and accessibility The Council will work with all sectors and interest groups to help deliver Green Infrastructure projects. Developers should use the guiding principles set out in the Green Infrastructure Delivery Plan to influence all development proposals from an early stage in the design process. Any new Green Infrastructure proposed must be accompanied by a plan for the long-term sustainable maintenance and management of these assets, as well as phasing plans to demonstrate how they are to be delivered. New Green Infrastructure should incorporate semi-natural habitats and provide net gains in biodiversity wherever possible. The long-term management of assets should include biodiversity recording/monitoring to verify/ensure the ecological integrity of GI networks. Green Infrastructure should, where appropriate, include access for the widest range of user groups. This Policy contributes towards achieving Objectives 6 and 8 of this Local Plan".	(document reference 7.1). There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required. Furthermore, habitat removed during the construction will be reinstated (with the exception of planting restrictions associated with operational requirements as identified within the Outline LEMP (document reference 7.4).

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HP4: Safeguarded Open Space	"Development that would result in the loss of the whole or part of areas designated as Safeguarded Open Space, as defined on the Policies Map and Local Maps will not be permitted unless the following criteria are met: a) the site is replaced by the provision of new site at least equal in quality and size and accessible to the community, which the existing site serves; b) it is demonstrated that there is no longer a demand for the existing site; c) the site is not appropriate for other open space functions; and d) the development of the site would not result in the loss of an area important to visual amenity. Land is also allocated for the future expansion of the Weeley Crematorium, the Burrs Road Cemetery (Clacton), Dovercourt Cemetery and the Kirby Cross Cemetery as shown on the various Policies Maps and Local Maps for these areas. New cemeteries and other burial places may be permitted on existing private land providing that relevant Local Plan policies are satisfied".	The Project avoids safeguarded open space identified on the Tendring District Local Plan 2013-2033 Policies Map. An Open Space Assessment has been prepared and reported in Appendix B Open Space Assessment of the Planning Statement (document reference 5.6). Open Space is defined in National Policy Statement EN-1 as including green and blue infrastructure. The Project has sought to avoid areas of open space, including green and blue infrastructure however within Tendring District area the Project interacts with two bodies of water in Ardleigh, Tendring which comprise of Ardleigh Fishing Pond and Ardleigh Reservoir. Resultantly, at Ardleigh Fishing Pond fishing will be prohibited here in totality, given the limited scale of the pond. The Design Development Report (document reference 5.15) outlines the alternative alignments which were considered to avoid oversailing the fishing pond (identifies as an area of local green space in he Ardleigh Neighbourhood Plan). Alternatives to avoid oversail of the water body, to allow continuation or intensification of angling were considered. These would necessitate multiple changes of direction, give routeing constraints and the presence of residential properties, whether passing to the east (residential properties within 200 m) or west (residential properties within around 100 m) of the water body. These multiple angle changes would reduce consistency with the Holford Rules and increase effects to multiple residential properties close to the alignment in this area. Due to the limited and informal level of angling activity and the additional environmental effects from the alternatives, retain the straighter 2023 preferred draft alignment and oversail the waterbody was preferred

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		although recognising that this would terminate the informal angling arrangements. For Ardleigh Reservoir angling will be prohibited within 30metres of the overhead lines. Angling will remain possible outside of this area on this part of the Reservoir and on the wider Reservoir, where already permitted. The Open Space Assessment found that there is a range of angling facilities within 10 miles of these sites which are considered a suitable alternative. The Project therefore complies with the policy requirements.
PPL1: Development and Flood Risk	"All development proposals should include appropriate measures to respond to the risk of flooding on and/or off site. Within the Flood Zone (which includes Flood Zones 2 and 3, as defined by the Environment Agency) shown on the Policies Map and Local Maps, or elsewhere involving sites of 1ha or more, development proposals must be accompanied by a Flood Risk Assessment. Where development is classified as "more vulnerable" the Flood Risk Assessment (FRA) should demonstrate that there will be no internal flooding in the event of a "design event flood". The FRA should demonstrate that in the event of a breach or failure of flood defence infrastructure, refuge will be available above flood levels and that a means of escape is possible from first floor level. All development classified as "More Vulnerable" or "Highly Vulnerable" within Flood Zone 2 and 3 should set finished floor levels 300mm above the known or modelled 1 in 100 annual probability (1% AEP) flood level including an allowance for climate change. All new development within Flood Zones 2 and 3 must not result in a net loss of flood storage capacity, unless	The FRA (document reference 7.9) has been submitted as part of the application for development consent focussing on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. A sequential approach has been taken in siting the Project. The majority of the Project lies within Flood Zone 1 and in zones that are at low risk of flooding from other sources. As addressed in the FRA (document reference 7.9), there are no pylons proposed in the floodplain in Tendring District area (Section C of the Project route). The Risk of Flooding from the Surface Water map shows that the majority of land within Section C is at very low risk of surface water flooding. As shown in the FRA (document reference 7.9), where there are interactions between the Project and any high risk zone during construction, these are mostly where temporary haul roads and pylon construction working areas are proposed. Due to its linear nature and the geographical extent of the Project, some components, namely pylons, must necessarily be located in areas with a medium and high risk of flooding (Flood Zones 2 and 3). The permanent Project works which lie within Flood Zone 3 are restricted to a small number of pylons for the overhead lines. These are

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	there is compensation on site or, if not possible, adjacent off-site capacity. Where possible opportunities should be sought to achieve an increase in floodplain storage. All major development proposals should consider the potential for new Blue and Green Infrastructure to help mitigate potential flood risk and include such Green Infrastructure, where appropriate. All development proposals will be considered against the National Planning Policy Framework's 'Sequential Test', to direct development toward sites at the lowest risk of flooding, unless they involve land specifically allocated for development on the Policies Maps or Local Maps. Where new development cannot be located in an area of lower flood risk and is otherwise sustainable, the Exception Test will be applied in accordance with the National Planning Policy Framework so that it is safe and meets wider sustainability needs. This Policy contributes towards achieving Objective 9 of this Local Plan".	designed such that they are resilient to flooding, ensuring the Project would be safe and could continue to operate. Detail on the Sequential and Exception Test are provided in Sections 5.1 and 5.2 of the FRA (document reference 7.9) submitted as part of the application for development consent. The Project is classified as 'essential infrastructure' with respect to flooding vulnerability in the NPPF. The CSE compound, which represents the parts of the Project that are most vulnerable to flooding, are situated in Flood Zone 1, satisfying the Sequential Test. The FRA has concluded that the Project during its construction would be generally at low risk of flooding from rivers. Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures. These measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk. During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the FRA. Above ground structures such as pylons and below ground structures such as the underground cable are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. Permanent above ground infrastructure for the Project in the floodplain would be limited to a small number of the pylons for the overhead line. The requirements for compensation of loss of floodplain storage associated with these pylons is addressed in the following sub-section and

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		secured by commitment W17 in the Outline CoCP (document reference 7.2).
PPL3: The Rural Landscape	"The Council will protect the rural landscape and refuse planning permission for any proposed development which would cause overriding harm to its character or appearance, including to: a) estuaries, rivers and undeveloped coast; b) skylines and prominent views including ridge-tops and plateau edges; c) traditional buildings and settlement settings; d) native hedgerows, trees and woodlands e) protected lanes, other rural lanes, bridleways and footpaths; and f) designated and non-designated heritage assets and historic landscapes including registered parks and gardens. Development proposals affecting protected landscapes must pay particular regard to the conservation and enhancement of the special character and appearance of the Dedham Vale and Suffolk Coast and Heaths AONBs, and their settings, including any relevant AONB Management Plan objectives. Elsewhere, development proposals should have regard to the Natural England Character Area profiles for the Greater Thames Estuary (No.81) and the Northern Thames Basin (No.111) and the Council's Landscape Character Assessments, as relevant, and should protect and reinforce identified positive landscape qualities. New development within the rural landscape should minimise the impact of light pollution on the site and its surroundings, in order to protect rural amenity and biodiversity.	The full assessment of the potential residual effects of the Project on landscape and visual amenity is contained in ES Chapter 13: Landscape and Visual (document reference 6.13) and ES Appendix 13.2: Landscape Baseline and Assessment (document reference 6.13.A2), ES Appendix 13.3: Visual Baseline and Assessment (document reference 6.13.A3) and ES Appendix 13.4: Residential Visual Amenity Assessment (document reference 6.13.A4). The landscape and visual amenity assessments indicate that the construction phases would result in significant negative landscape and visual amenity effects during construction. These significant effects are related to the introduction of construction activity and equipment, including the loss of some landscape features including farmland and field boundary vegetation. At Year 15 of operation, following the maturation of mitigation planting, the assessment concludes that significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure projects, as set out in Paragraphs 5.10.5 and 5.10.13 of NPS EN-1. With regards to the Dedham Vale National Landscape, the Project would be undergrounded through Dedham Vale National Landscape and adjacent landscapes. Further information about undergrounding is provided in the Design Development Report (document reference 5.15) and Consultation Report (document reference 5.1A and B). ES Chapter 13: Landscape and Visual (document reference 6.13) identifies the potential for major and significant effects during the construction phase however these would reduce

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	This Policy contributes towards achieving Objectives 7 and 8 of this Local Plan".	to minor and not significant effects during operation once the underground cables are covered over and land use and landcover reinstated as far as possible. Whilst adverse landscape and visual effects are anticipated, it is considered that there are exceptional circumstances to justify the Project in the Dedham Vale National Landscape and it has been demonstrated that the Project is critical to the delivery of clean power, and therefore in the public interest. Adverse effects have been assessed in ES Appendix 13.2: Landscape Baseline and Assessment (document reference 6.13.A2) during the construction phase on Wick Lane (a protected lane) due to a concentration of construction activity and equipment associated with the construction of the overhead line, EACN Substation and underground cables and works to third party infrastructure, to the north, west and east of Ardleigh. With regard to National Grid's report, National Landscapes: Duty to Seek to Further the Purposes Report (s85 of Countryside and Rights of Way Act 2000) (document reference 5.10) sets out the current status of National Grid's consideration of its duty, in relation to the Project, to seek to further the purpose of the National Landscape, which is to 'conserve and enhance natural beauty' in accordance with section 85 of the Countryside and Rights of Way Act 2000 (CRoW Act) (as amended by section 245 LURA 2023). The design of the Project has considered the Protected Landscapes and sought to avoid harm and identify whether measures can be embedded in the design in accordance with Defra guidance when seeking to contribute and further the purpose of the designation.

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		In addition to taking the National Landscape into consideration through all stages of the Project design as explained above, in line with the Defra guidance (Defra, 2024) additional 'appropriate, reasonable and proportionate steps' are under consideration in respect of the duty to seek to further the statutory purposes of the National Landscape. This is ongoing and being progressed in consultation with the DVNL Partnership Team and key stakeholders. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1). There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required. Furthermore, habitat removed during the construction will be reinstated (with the exception of planting restrictions associated with operational requirements as identified within the Outline LEMP (document reference 7.4). With regards to point (e) on protected lanes vegetation, earthworks (such as banks or ditches) and other boundary features (such as walls or fencing) that border protected lanes, as designated by Local Authorities, will be reinstated as close to their pre-construction condition as possible as set out in the commitments of the Outline CoCP (document reference 7.2). Pre-construction photographs will be taken to ensure a record is available to inform any reinstatement. The Outline PRoW Management Plan (document reference 7.6) provides a list of each of the affected PRoWs and the proposed management proposals. The Project is not

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		expected to result in any permanent closures or diversions of footways or the cycle network as a result of the construction activities of the Project. A limited number of temporary diversions and crossing points are required for PRoWs affected by the construction of the Project. The Outline Public Rights of Way (PRoW) Management Plan (document reference 7.3) explains the details of the temporary short-term diversions and appropriate measures for the management of PRoW during the various stages of the Project. In relation to point (f) ES Chapter 11: Historic Environment (document reference 6.11) report assesses the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets (document reference 6.11.A7) found that the Project would not result in substantial harm to any heritage assets. Chapter 11: Historic Environment (document reference 6.11) concludes that within Tendring District Council (Section C) the project would result in permanent adverse magnitude of impact to 1 designated assets due to a change in setting but this impact would be at the lower end of the spectrum of less than substantial harm. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and /

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		or permanent plant, machinery and infrastructure into the setting. The substantial public benefits and need for the Project, as set out in Chapter 5 of the Planning Statement (document reference 5.6), including supporting the UK's net zero target, enabling the connection in East Anglia of new low carbon energy generation, and reinforcing the transmission network clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage assets of scheduled quality. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) and ES Chapter 13: Landscape and Visual (document reference 6.13) present the assessment of likely significant ecology and biodiversity, and landscape and visual effects that could result from the Project including lighting impacts. The assessment of lighting in both these ES chapters has been based on the assumptions that: All works associated with substation - exterior and interior lighting would be provided at the site to allow for safe movement and the operation of equipment. All lighting would be designed in accordance with the appropriate design standards and be motion-sensor activated. A typical construction day will consist of 12-hours meaning in winter this would require working in the dark at either end of the day. For the purposes of the ES, it is therefore assumed that winter working will require lighting at certain sites but will not be wide scale across the Project.

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		The Outline CoCP (document reference 7.2) sets out the good practice measures to protect Ecology, Biodiversity, and Landscape and Visual environments during construction and operation. Key measures include directional and minimised construction lighting (LV03), locating potentially disruptive activities and equipment away from sensitive receptors like residential areas and ecological sites where practicable (GG22), designing permanent lighting to minimise impacts on adjacent properties, protected species, and habitats (GG31), and ensuring construction lighting is switched off when not in use and positioned to avoid spillover onto nearby land or vegetation (B06). Tendring District Council considers that ES Chapter 13 does not fully address impacts on landscape of Colne Valley including open access land and Essex Way. This matter remains under discussion. See Draft Statement of Common Ground with Tendring District Council (document reference 5.9.7)
PPL4: Biodiversity and Geodiversity	"Sites designated for their international, European and national importance to nature conservation: including Ramsar sites; Special Protection Areas (SPAs); Special Areas of Conservation (SACs); Marine Conservation Zones (MCZs); National Nature Reserves (NNRs); and Sites of Special Scientific Interest (SSSIs) will be protected from development likely to have an adverse effect on their integrity. Where proposals for development are likely to significantly impact upon International and European sites, applications must be supported by a Habitats Regulation Assessment (HRA) to provide sufficient information to the Council to establish the likelihood and nature of impacts before a decision can be made. If	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) presents the assessment of the likely significant ecology and biodiversity effects that could result from the Project. The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats during the construction and operation (including maintenance). The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. ES

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	necessary, this may need to be followed by a more detailed 'Appropriate Assessment' of the impacts. An Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) has been completed in compliance with the habitats Directive and Habitats Regulations. Contributions will be secured from residential development, within the Zones of Influence, towards mitigation measures identified in RAMS. As a minimum, there should be no significant impacts upon any protected species, including European Protected Species and schemes should consider (and include provision, as may be relevant for) the preservation, restoration or re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations. Proposals for new development should also have regard to any published local Recreational Disturbance Avoidance and Mitigation Strategies and include any measures which may be necessary to support the aims of the strategy, to help to mitigate any likely recreational impacts arising from the development. Proposals for enhancement of special interest and features will be supported, subject to other material planning considerations. Sites designated for their local importance to nature conservation, including Local Wildlife Sites (LoWS), Ancient Woodlands Protected Verges and aged or veteran trees will be protected from development likely to have an adverse impact on such sites or features. Proposals for enhancement of special interest and features will be supported, subject to other material planning considerations. Proposals for new development should be supported by an appropriate ecological assessment. Where new	Chapter 8: Ecology and Biodiversity (document reference 6.8) concludes there will be some temporary impact associated with the construction phase to both statutory designated sites and non-statutory designed sites. These temporary impacts will be mitigated through the standard mitigation measures set out in the Outline CoCP (document reference 7.2) which will remove potential significant effects associated with dust, noise and hydrological effects on most statutory designated sites within the Study Area. Where the construction phase results in temporary habitat damage or loss the habitat will be reinstated post-construction ensuring there would be no long-term adverse impact. Some of the woodland habitats cannot be replaced due to safety clearances and therefore, mitigation in the form of compensation planting is proposed. The HRA Report (document reference 5.3) provides the relevant information to inform the Secretary of State's Habitats Regulations Assessment (HRA) for the Project. The HRA concluded found there would be no adverse effects on the integrity of a European Site (following the implementation of mitigation) have been identified from the stage 2 during the Appropriate Assessment (as set out in the HRA report), and therefore the HRA does not require progression to Stage 3 (derogation) of the HRA process. In addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site

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	development would harm biodiversity or geodiversity, planning permission will only be granted in exceptional circumstances, where the benefits of the development demonstrably outweigh the harm caused and where adequate mitigation or, as a last resort, compensation measures are included, to ensure a net gain, in biodiversity. Proposals for new infrastructure and major development should consider the potential for enhanced biodiversity, appropriate to the site and its location, including, where appropriate, within Green Infrastructure. Any proposed development on sites which may support protected species will require a relevant survey(s), undertaken by a suitably qualified ecologist. If protected species are present, a suitable mitigation plan will be required prior to planning permission being granted. This Policy contributes towards achieving Objective 8 of this Local Plan".	mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1). There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required. In relation to Ancient Woodlands, the physical extent of each ancient woodland along the Project has been mapped based on a combination of aerial imagery and based on information obtained from the ground truthing woodland surveys. Table 8.23 in ES Chapter 8: Ecology and Biodiversity (document reference 6.7) lists the Ancient Woodlands identified within a 200m of the Project's Order Limits and identifies the proposed mitigation measure/commitment. The location and further information relating to all Ancient Woodlands is presented within Appendix 8.1: Habitats Report and presented on Figure A8.1.3: Ancient Woodland Locations (document reference 6.8.A1). In addition, the Project has considered 11 woodlands to be Ancient Woodland within ES Chapter 8: Ecology and Biodiversity (document reference 6.8) due to the Local Wildlife Site citations mentioning these woodlands support ancient woodland features. These woodlands have therefore been included in the impact assessment as Ancient Woodland. Potential impacts (excavation and non-excavation), in the absence of mitigation, were identified at 10 ancient woodland parcels. As a result of these Project commitments impacts associated with five ancient woodlands have been completely. The remaining 5 ancient woodlands (and the associated 15 m buffer) is unavoidable as all proposed works relate to the removal, undergrounding or modification of existing third-party infrastructure (11 kV, 33 kV, 132 kV), with the existing assets already located within the associated woodland or

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		root protection zone. Out of the remaining ancient woodlands none are located within Tendring (Section C of the Project route) therefore there will be no impacts to ancient woodlands. A comprehensive explanation of the Project approach to ancient woodland avoidance and minimisation of impact on ancient woodland is detailed in Appendix B: Ancient Woodland and Veteran Tree Strategy (document reference 7.4.B)
PPL5: Water Conservation, Drainage & Sewerage	"All new development must make adequate provision for drainage and sewerage and should include Sustainable Drainage Systems (SuDS) as a means of reducing flood risk, improving water quality, enhancing the Green Infrastructure network and providing amenity and biodiversity benefits. Applicants should explain and justify the reasons for not using SuDS if not included in their proposals, which should include water inputs and outputs designed to protect and, where possible, enhance the natural environment. New dwellings will be required to incorporate measures to achieve a water consumption rate of not more than 110 litres, per person, per day. Proposals for development must demonstrate that adequate provision exists, or can be provided in time, for sewage disposal to a public sewer and water recycling centre (sewage treatment works). Applicants should explain their approach to water conservation, including the potential for the re-use of 'greywater' and rainwater 'capture and use' within their development, to help maintain the supply of drinking water. The Council will require such measures to be implemented in all new development. Private sewage treatment facilities will not be permitted if there is an accessible public fowl sewer. Where private	The FRA (document reference 7.9) states that access roads and haul roads, as well as areas where impermeable material will be installed in areas where heavy equipment would be used, will have suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff appropriate to local conditions. Annex C of the FRA (document reference 7.9) contains further details on SuDs.

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	sewage treatment facilities are the only practical option for sewage disposal, they will only be permitted where there would be no harm to the environment, having regard to preventing pollution of groundwater and any watercourses and odour. Proposals for agricultural reservoirs may be permitted, subject to a detailed assessment against relevant policies in this Local Plan".	
PPL7: Archaeology	"Any new development which would affect, or might affect, designated or non-designated archaeological remains will only be considered where accompanied by an appropriate desk-based assessment. Where identified as necessary within that desk-based assessment, a written scheme of investigation including excavation, recording or protection and deposition of archaeological records in a public archive will be required to be submitted to, and approved by, the Local Planning Authority. Proposals for new development affecting a heritage asset of archaeological importance or its setting will only be permitted where it will protect or where appropriate enhance the significance of the asset. Where a proposal will cause harm to the asset, the relevant paragraphs of the NPPF should be applied dependent on the level of the harm caused. Proposals will be treated favourably where they: a) are explained and justified through an informed assessment and understanding of the significance of the heritage asset (including any contribution made to that significance by its setting); and b) are of a scale, design and use materials and finishes that respect the heritage asset.	ES Chapter 11: Historic Environment (document reference 6.11) report assesses the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. Mitigation measures to reduce impacts on archaeology are set out in the Archaeological Mitigation Strategy and Outline WSI (document reference 7.5) and includes preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction. The Draft Statement of Common Ground with Tendring District Council (document reference 5.9.7) notes that concerns the local planning authority's concerns that not all non-designated heritage assets have been included in the assessment which raises concerns around the robustness of the methodology. These matters remain in discussion.

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	Within the District the Council keeps a record of scheduled monuments at risk of degradation. The Council will support proposals that protect and enhance heritage assets at risk. Proposals for new development which are not able to demonstrate that known or possible archaeological remains will be suitably protected from loss or harm, or have an appropriate level of recording, will not be permitted. This Policy contributes towards achieving Objective 7 of this Local Plan".	
PPL8: Conservation Areas	"New development within a designated Conservation Area, or which affects its setting, will only be permitted where it has regard to the desirability of preserving or enhancing the special character and appearance of the area, especially in terms of: a) scale and design, particularly in relation to neighbouring buildings and spaces; b) materials and finishes, including boundary treatments appropriate to the context; c) hard and soft landscaping; d) the importance of spaces and trees to the character or appearance; and e) any important views into, out of, or within the Conservation Area. Proposals should be explained and justified through an informed assessment and understanding of the significance of the heritage asset (including any contribution made to that significance by its setting). Proposals for new development involving demolition within a designated Conservation Area must demonstrate why they would be acceptable, particularly	The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets through the process of design development, and by embedding measures into the design of the Project. ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the likely significant cultural heritage effects that could result from the Project. The Project does avoid direct interaction with any conservation areas in Tendring District Council, namely with Ardleigh Conservation Area which is the closest to the Project's Order Limits. The assessment of impacts on Ardleigh Conservation Area contained in ES Appendix 11.2: Historic Environment Assessment Tables (document reference 6.11.A2) identifies the potential for temporary minor adverse effects on the Conservation Area (not significant) during construction and operation. An assessment of the effects on Listed Buildings is documented in ES Appendix 11.2: Historic Environment Assessment Tables (document reference 6.11.A2). The ES Chapter concludes that within Tendring District Council the

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	in terms of the preservation and enhancement of any significance and impact upon the Conservation Area. Where a proposal will cause harm to a Conservation Area, the relevant paragraphs of the NPPF should be applied dependent on the level of harm caused. Within the District the Council keeps a record of conservation areas that are at risk of degradation. The Council will support proposals that protect and enhance the conservation areas at risk. Development should conserve or enhance the significance of the registered parks and gardens (noting that significance may be harmed by development within the setting of an asset). In collaboration with community groups and other interested parties, the Council will consider and support the designation of new Conservation Areas in line with the relevant criteria as set out within the NPPF and legislation. New Conservation Area Management Plans will be prepared in addition to updates to the existing Conservation Area Character Appraisals. This Policy contributes towards achieving Objective 7 of this Local Plan".	Project would not result in substantial harm to any heritage assets, but it would result in the loss of significance to heritage assets due to the introduction of temporary and/or permanent plant, machinery and infrastructure into the setting. Within Tendring District Local Plan area significant adverse effects have been identified at 1 Grade II listed asset. This harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.
PPL9: Listed Buildings	"Proposals for new development affecting a listed building or its setting will only be permitted where they will protect its special architectural or historic interest, its character, appearance and fabric. Where a proposal will cause harm to a listed building, the relevant paragraphs of the NPPF should be applied dependent on the level of harm caused. Proposals will be treated favourably where they: a) are explained and justified through an informed assessment and understanding of the significance of	

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	the heritage asset (including any contribution made to that significance by its setting); and b) are of a scale, design and use materials and finishes that respect the significance of the listed building (including any contribution made to that significance by its setting)…".	
Policy PPL13: Ardleigh Reservoir Catchment Area	"The Council will support proposals which involve the role, function and operation of Ardleigh Reservoir, its Treatment Works and associated networks subject to consideration against other policies in this Local Plan. Ardleigh Reservoir is surrounded by a catchment area within which certain proposals for development will be subject to consultation with the operator of the site. This may result in restrictions being imposed or planning permission being refused if the development could materially affect the quality of water draining into the reservoir".	The Order Limits pass through the defined catchment area for Ardleigh Reservoir. There is also interaction between the overhead line and Ardleigh Reservoir. Appendix B Open Space Assessment of the Planning Statement (document reference 7.5.B) concluded that the Project will over sail the northernmost section of the Ardleigh Reservoir. This will result in angling in the northernmost section of the Reservoir, north of Wick Lane, to be prohibited along a 30-metre swathe. Angling will remain possible outside of this area on this part of the Reservoir and on the wider Reservoir, where already permitted. The Open Space Assessment undertook a desktop review of fishing provision in the locality of Ardleigh Reservoir that could provide alternative provision to compensate the impact to angling. It was concluded that there are a range of angling facilities within 10 miles of the site that are open to the public.
Policy CP1: Sustainable Transport and Accessibility	"Proposals for new development must be sustainable in terms of transport and accessibility and therefore should include and encourage opportunities for access to sustainable modes of transport, including walking, cycling and public transport. Providing options for non-motorised vehicles is especially important for the large-scale developments at Clacton and the Tendring Colchester Borders Garden Community. Planning applications for new major development likely to have significant transport implications will normally	ES Chapter 16: Traffic and Transport (document reference 6.16) demonstrates that with embedded mitigation measures, the traffic generated during construction and operation (including maintenance) of the Project will not result in significant adverse effects on road users, equestrians, walkers, cyclists and horse riders and road links in terms of delay, severance, amenity, fear and intimidation, accidents and road safety, and parking and loading.

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	require a Transport Statement. If the proposal is likely to have significant transport implications or a Transport Assessment, the scope of which should be agreed in advance between the District Council and the applicant, in consultation with Essex County Council as the Highway Authority. In order to reduce dependence upon private car transport, improve the quality of life for local residents, facilitate business and improve the experience for visitors, all such applications should include proposals for walking and cycling routes and new or improved bus-stops/services. Where relevant, improvements to railway station passenger facilities should be included and greater connectivity between places and modes of transport demonstrated. Travel Plans and Residential Travel Information Packs should be provided as appropriate and in accordance with Essex County Council published guidance. The Essex Cycling Strategy will be used as a guide to ensure the provision of appropriate cycling infrastructure".	The Outline PRoW Management Plan (document reference 7.6) provides a list of each of the affected PRoWs and the proposed management proposals. The Project is not expected to result in any permanent closures or diversions of footways or the cycle network as a result of the construction activities of the Project. A limited number of temporary diversions and crossing points are required for PRoW affected by the construction of the Project. The Outline Public Rights of Way (PRoW) Management Plan (document reference 7.3) explains the details of the temporary short-term diversions and appropriate measures for the management of PRoW during the various stages of the Project. The assessment in ES Chapter 6.16 Traffic and Transport (document reference 6.16) concluded that a short term neutral or minor adverse effect is expected on all PRoW from pedestrians, cyclists and horse-rider delays, and overall these are therefore expected to be not significant. The assessment also concludes that with mitigation measures, no significant adverse effects on sensitive receptors including PRoW, and on the use and safety of the road network, are anticipated during construction. Details of the strategy for PRoWs and the management regimes can be found within the PRoW Management Plan (document reference 7.6). From a transport and highways perspective, due to the nature of the Project and the requirement for a rural location, links to sustainable means of transport are difficult to achieve. During construction efforts will be made to encourage the use of sustainable transport modes for construction workers. Appendix B Outline Construction Worker Travel Plan of the Outline CTMP (document

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		reference 7.3) contains the Travel Plan, setting out the good practice measures that will be in place to encourage sustainable transportation for the workforce, in a way that reduces both environmental and social impacts on the local area. The objective of the Travel Plan is to encourage a reduction in the quantity of single-occupancy car journeys and to create a shift towards more sustainable modes of transport.
Braintree District Council Local Plan (July 2022) Section 1 and 2		
Policy SP 1 – Presumption in Favour of Sustainable Development	"When considering development proposals the Local Planning Authorities will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. They will always work pro-actively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Development that complies with the Plan will be approved without delay, unless material considerations indicate".	The Planning Statement (document reference 5.6) provides an assessment of the Project against the sustainable development objectives for the Planning system set out in the NPPF. The Project is Critical National Priority Infrastructure as defined in National Policy Statement EN-1 and is essential to ensure the existing transmission network will have sufficient capacity for the new renewable energy (a substantial proportion of which is generated by offshore wind) that is expected to connect to the network over the next ten years and beyond.
Policy SP7 – Place Shaping Principles	"All new development must meet high standards of urban and architectural design. Development frameworks, masterplans, design codes, and other design guidance documents will be prepared in consultation with stakeholders where they are needed to support this objective. All new development should reflect the following place shaping principles, where applicable: • Respond positively to local character and context to preserve and enhance the quality of existing places and their environs;	The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce adverse environmental impacts through the process of design development, and by embedding measures into the design of the Project. The Planning Statement (document reference 5.6) explains how good design has been embedded in the project from the outset. The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. The

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	• Provide buildings that exhibit individual architectural quality within well-considered public and private realms; • Protect and enhance assets of historical or natural value; Incorporate biodiversity creation and enhancement measures; • Create well-connected places that prioritise the needs of pedestrians, cyclists and public transport services above use of the private car; • Provide a mix of land uses, services and densities with well-defined public and private spaces to create sustainable well-designed neighbourhoods; • Enhance the public realm through additional landscaping, street furniture and other distinctive features that help to create a sense of place; • Provide streets and spaces that are overlooked and active and promote inclusive access; • Include parking facilities that are well integrated as part of the overall design and are adaptable if levels of private car ownership fall; • Provide an integrated and connected network of biodiverse public open space and green and blue infrastructure, thereby helping to alleviate recreational pressure on designated sites; • Include measures to promote environmental sustainability including addressing energy and water efficiency, and provision of appropriate water and wastewater and flood mitigation measures including the use of open space to provide flora and fauna rich sustainable drainage solutions; and	Design Development Report (document reference 5.15) provides an explanation of the main changes in the route alignment and technology following the review and consideration of feedback received to the 2024 statutory consultation and to the targeted statutory and non-statutory consultations held in 2025. A Design and Access Statement (document reference 7.15) has also been produced which summarises National Grid's approach to good design and demonstrates how National Grid has responded to the physical, environmental and socio-economic context of the overhead line route and CSE compound locations (including those at Fairstead) and responded to consultation to define the Project. National Grid have considered the proposed materials and colour palette for the CSE compounds and new substation / substation extension, including buildings to be sensitive to the environment they are located in, where practicable. Further information is included in the Design Appraisal for Site-Specific Infrastructure (document reference 7.16). In accordance with the requirements listed in this policy that are considered to the of relevance the Project will: Protect the historic environment - In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. ES Chapter 11: Historic Environment (document reference 6.11) found that there would be permanent medium to high adverse magnitude of impacts, due to changes in settings that affect the value of 3 designated assets and in Braintree District (referred to as Section E in ES Chapter 11), this would be on the lower spectrum of less than substantial harm. Whilst the Project will not result in substantial harm to designated heritage

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	Protect the amenity of existing and future residents and users with regard to noise, vibration, smell, loss of light, overbearing and overlooking".	assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. The harm is therefore thought to be outweighed by the public benefit of the Project. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Braintree District Council have noted concerns around the methodology around the value of listed buildings. It is considered that the assessment methodology has been agreed, with the exception of the value of Grade II listed buildings, where the method is still under discussion. See Braintree District Council Draft Statement of Common Ground (document reference 5.9.9). Incorporate biodiversity creation and enhancement measures - National Grid has taken opportunities to provide mitigation and enhancement measures within the Order limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1). There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required.

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		Provision of appropriate water and wastewater and flood mitigation measures - During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the FRA (document reference 7.9). Above ground structures such as pylons and below ground structures such as the underground cable are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. The Outline CoCP (document reference 7.2) describes the good practice measures including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime. Protect the amenity of existing and future residents and users with regard to noise, vibration, smell, loss of light, overbearing and overlooking. Impacts of the Project on environmental conditions and neighbouring uses including approved development likely to come forward in the future is assessed in the ES Chapters and the associated assessment reports, see ES Chapter 7: Air Quality (document reference 6.7), ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9), ES Chapter 10: Health and Wellbeing (document reference 6.10), ES Chapter 12: Hydrology and Land Drainage (document reference 6.12), ES Chapter 13: Landscape and Visual (document reference 6.13), ES Chapter 14: Noise and Vibration (document reference 6.14), ES Chapter 16: Traffic and Transport (document reference 6.16), ES Chapter 17: Cumulative Effects

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		(document reference 6.17). The assessment in the ES chapters has helped to underpin the embedded mitigation and additional mitigation measures needed to minimise significant adverse effects on the environment. The measures are set out in the Outline CoCP (document reference 7.2) which, amongst other matters, provides measures for the control and reduction of impacts relating to noise, vibration, smell, loss of light, overbearing and overlooking.
Policy LPP42 – Sustainable Transport	"Sustainable modes of transport should be facilitated through new developments to promote accessibility and integration into the wider community and existing networks. Priority should be given to cycle and pedestrian movements and access to public transport. Development proposals should provide appropriate provision for all the following transport modes: • Pedestrians (including disabled persons and those with impaired mobility), through safe, accessible, direct and convenient design and layout of routes within the new development and wider pedestrian network. Safeguarding existing Public Rights of Way and promoting enhancements to the network, where appropriate, to offer multi-user routes for walking, cycling and other recreational opportunities such as horse riding • Cyclists, through safe design and layout of routes integrated into the new development and contributing towards the development and enhancement of the and shower facilities	ES Chapter 16: Traffic and Transport (document reference 6.16) demonstrates that with embedded mitigation measures, the traffic generated during construction and operation (including maintenance) of the Project will not result in significant adverse effects on road users, equestrians, walkers, cyclists and horse riders and road links in terms of delay, severance, amenity, fear and intimidation, accidents and road safety, and parking and loading. The Outline PRoW Management Plan (document reference 7.6) provides a list of each of the affected PRoWs and the proposed management proposals. The Project is not expected to result in any permanent closures or diversions of footways or the cycle network as a result of the construction activities of the Project. A limited number of temporary diversions and crossing points are required for PRoW affected by the construction of the Project. The Outline Public Rights of Way (PRoW) Management Plan (document reference 7.3) explains the details of the temporary short-term diversions and appropriate measures for the management of PRoW during the various stages of the Project. The assessment in ES Chapter 6.16 Traffic and Transport (document reference 6.16) concluded that a short term

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	• Public transport, through measures that will improve and support public transport and provide new public transport routes • Community transport, through measures that will promote car pools, car sharing and voluntary community buses, community services and cycle schemes • Servicing, refuse and emergency vehicles where viable and practical • Facilities for charging plug-in and other ultra-low emission vehicles will be provided at all new residential properties. Development will be required to be consistent with and contribute to the implementation of the 'Essex Transport Strategy' Local Transport Plan for Essex or its successors. Developers may be required to produce Travel Plans, Transport Assessments and Statements as considered appropriate by the Local Planning Authority. The Essex County Council Transportation Development Management Policies provide further detail on requirements relating to accessibility and access including Transport Assessment and Statement thresholds for each land use category. Highway works (S.278) and/or financial contributions (S.106) from development proposals will be sought, where appropriate and viable, towards achieving the above objectives including the construction of new or improvements to the existing PROW network and/or off-site cycleway and footpaths, and additional off-site public car parking, if required.	neutral or minor adverse effect is expected on all PRoW from pedestrians, cyclists, horse-rider delays, and overall these are therefore expected to be not significant. The assessment also concludes that with mitigation measures, no significant adverse effects on sensitive receptors including PRoW, and on the use and safety of the road network, are anticipated during construction. Details of the strategy for PRoWs and the management regimes can be found within the PRoW Management Plan (document reference 7.6). From a transport and highways perspective, due to the nature of the Project and the requirement for a rural location, links to sustainable means of transport are difficult to achieve. During construction efforts will be made to encourage the use of sustainable transport modes for construction workers. Appendix B Outline Construction Worker Travel Plan of the Outline CTMP (document reference 7.3) contains the Travel Plan, setting out the good practice measures that will be in place to encourage sustainable transportation for the workforce, in a way that reduces both environmental and social impacts on the local area. The objective of the Travel Plan is to encourage a reduction in the quantity of single-occupancy car journeys and to create a shift towards more sustainable modes of transport

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	Development which would adversely affect the character of, or result in loss of existing or proposed rights of way, will not be permitted unless alternative provision or diversions can be arranged which are at least as attractive, safe and convenient for public use. This will apply to rights of way for pedestrian, cyclist or horse rider use. Improvements to such rights will be sought in association with new development to enable new or improved links to be created within the settlement, between settlements and/or providing access to the countryside or green infrastructure sites".	
Policy LPP 47 Built and Historic Environment	"The Council will promote and secure a high standard of design and layout in all new development and the protection and enhancement of the historic environment in order to: a. Respect and respond to the local context, especially in the District's historic areas, where development may affect the setting of listed buildings and other buildings of historic or architectural significance, conservation areas, registered parks and gardens, scheduled monuments and areas of high archaeological and landscape sensitivity b. Promote and encourage the contribution that heritage assets can make towards driving regeneration, economic development, tourism and leisure provision in the District c. Actively encourage local groups to formulate Local Lists of buildings and structures of historic or architectural significance	The Design Development Report (document reference 5.15), ES Chapter 3 Alternatives (document reference 6.3), Design and Access Statement (document reference 7.15) and Design Appraisal Site Specific Infrastructure (document reference 7.16) provide an overview of the design rationale for the Project. They set out a summary of National Grid's approach to good design and demonstrate how National Grid has responded to the physical, environmental and socio-economic context of the overhead line route and cable end sealing compound and substation locations and responded to consultation. ES Chapter 11 Historic Environment (document reference 6.11) assesses the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially

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	d. Create built environments which are safe and accessible to everyone and which will contribute towards the quality of life in all towns and villages e. Create good quality built environments in commercial and business districts and in the public realm as well as in residential areas f. Be capable of meeting the changing future needs of occupiers g. Promote the sympathetic re-use of buildings, particularly where they make a positive contribution to the delivery of sustainable development and regeneration".	significant adverse effects on cultural heritage and archaeological assets. The ES Chapter concludes that the Project would not result in substantial harm to any listed buildings. Chapter 11: Historic Environment (document reference 6.11) concludes that within Braintree the project would result in permanent adverse magnitude of impact to 3 designated assets. This impact is considered to be on the lower spectrum of less than substantial. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. This harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.
LPP 50 Provision for Open Space, Sport and Recreation	"All developments will be expected to provide new open spaces in line with the requirements set out in the Open Space Supplementary Planning Document 2009 or successor document… Open space, sports and recreational land and buildings that are identified as needed in the Council's Open Space Study and/or are of particular value to a local community, will be protected by the Council. Areas of particular quality may include: • Small areas of open space in urban areas that provide an important local amenity and offer recreational and play opportunities	The Project is considered to be exempt from the first part of this policy which requires all development to provide new open spaces due to the nature of the Project. The Project has sought to avoid works within areas of designated open space throughout. Table B.1 of Appendix B Open Space Assessment of the Planning Statement (document reference 5.6) provides an overview of open spaces that are located within or adjacent to the Order Limits of the Project and an assessment of the impacts of the Project In Braintree, the Project interacts with seven areas of open spaces. There will be no permanent loss of open space in

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	• Areas of open space that provide a community resource and can be used for informal or formal events such as community, religious and cultural festivals • Areas of open space that particularly benefit wildlife and biodiversity • Areas identified as visually important on the Proposals Map • Play areas, and sport and recreation grounds and associated facilities. Existing open space, sports and recreational buildings shall not be built on unless a robust and up to date assessment has been undertaken which has clearly demonstrated that they are surplus to requirements or the proposed development is otherwise compliant with this policy as a whole. For open space, 'surplus to requirements' should include consideration of all the functions that open space can perform. Not all open space, sport and recreational land and buildings are of equal merit and some may be available for alternative uses. Developers will need to consult the local community and demonstrate that any proposals are widely supported by them. In considering planning applications which could impact on open space, the Council shall weigh any benefits being offered to the community against the loss of open space that will occur. The Council will seek to ensure that all proposed development takes account of, and is sensitive to, the local context. In this regard, the Council shall consider applications with the intention of:	these locations, in accordance with Policy LPP 50. However, there will be short term impacts due to construction works and oversail may also result in hedgerow and trees being managed in certain locations. The short term impacts are not considered to conflict with Policy LPP 50. Where there is oversail, the character of an open space may be impacted which is identified as a consideration in LPP 50. However, the benefits of the Project are considered to outweigh these impacts, which are limited in their incidence and impact, and will not undermine the overall quality of provision of open space in Braintree.

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	• Avoiding any erosion of recreational function and maintaining or enhancing the character of open spaces • Ensuring that open spaces do not suffer from increased overlooking, traffic flows or other encroachment • Protecting and enhancing those parts of the rights of way network that may benefit open space and access to the wider countryside".	
LPP 53 (Conservation Areas)	"The Council will encourage the preservation and enhancement of the character and appearance of designated Conservation Areas and their settings. These include the buildings, open spaces, landscape and historic features and views into, out from and within the constituent parts of designated areas…".	The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets through the process of design development, and by embedding measures into the design of the Project. ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the likely significant cultural heritage effects that could result from the Project. Within Braintree District Council the Project avoids direct interaction with the Coggeshall, Silver End, Kelvedon, White Notley, Terling Conservation Areas (noted as being in proximity to the Project).
LPP 59 - Archaeological Evaluation, Excavation and Recording	"Where important archaeological remains are thought to be at risk from development, or if the development could impact on a Scheduled Monument or Registered Park and Garden, the developer will be required to arrange for an archaeological evaluation of the site to be undertaken and submitted as part of the planning application. The Essex Historic Environment Record should be the primary source for assessment for archaeological potential. The evaluation will assess the character, significance and extent of the archaeological remains	ES Chapter 11: Historic Environment (document reference 6.11) assesses the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially

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	and will allow an informed decision to be made on the planning application. Such assessments should be proportionate to the importance of the site and a programme of archaeological investigation may be necessary for sites likely to contain significant archaeology. Planning permission will not be granted if the remains identified are of sufficient importance to be preserved in situ and cannot be so preserved in the context of the development proposed, taking account of the necessary construction techniques to be used. Where archaeological potential is identified but there is no overriding case for any remains to be preserved in situ, development which would destroy or disturb potential remains will be permitted, subject to conditions ensuring an appropriate programme of archaeological investigation, recording, reporting and archiving, prior to development commencing. There will be a requirement to make the result of these investigations publicly accessible".	significant adverse effects on cultural heritage and archaeological assets. Appendix 11.1: Historic Environment Baseline Report (document reference 6.11.A1) provides a detailed overview of the heritage assets within the defined Study Areas for Braintree District Council (Section E of the Project route) and a discussion of the prehistoric and historical development of the landscape within this section of the Project. The Baseline Report found that the Project would effect two Scheduled Monuments which will result in the loss of significance due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. The impact is predicted to be negligible/low adverse magnitude of impact. The Project would not effect any Registered Park and Gardens within Braintree District Council area. Mitigation measures to reduce impacts on archaeology are set out in the Archaeological Mitigation Strategy and Outline WSI (document reference 7.5) and includes preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction.

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LPP 63 – Natural Environment and Green Infrastructure	"Development proposals must take available measures to ensure the protection and enhancement of the natural environment, habitats, biodiversity and geodiversity of the District and to be acceptable, also taking climate change and water scarcity into account in their design. This will include protection from pollution. Proposals inside the District which are likely to adversely affect, either individually or cumulatively, International or Nationally designated nature conservation sites within and outside the District will not normally be acceptable. The Council will expect all development proposals, where appropriate, to contribute towards the delivery of new Green Infrastructure which develops and enhances a network of multi-functional spaces and natural features throughout the District. This will be proportionate to the scale of the proposed development and the rural or urban context. The Council will support and encourage development which contributes to the District's existing Green Infrastructure and where possible, enhances and protects networks and adds to their functions. It will secure additional provision where deficiencies have been identified. Open space and green infrastructure may in some instances be required to provide alternatives to European sites and that such sites should be designed and managed appropriately to maximise their potential effectiveness in this role. Proposals which undermine these principles will not be acceptable".	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) presents the assessment of likely significant ecology and biodiversity impacts. It concludes that the Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during both the construction and operation (including maintenance) within Braintree District Council (Section E of the Project route). With regards to the second part of the policy the Project would help to contribute towards the delivery of new Green Infrastructure through the provision of mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. Although there is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required the Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1).
LPP 64 – Protected Sites	"International Designations Sites designated for their international importance to nature conservation; including Ramsar sites, Special Protection Areas (SPA), Special Areas of Conservation (SAC), should be protected from development likely to	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) presents the assessment of likely significant ecology and biodiversity impacts. It concludes that the Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological

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	have an adverse affect on their integrity whether they are inside or outside the District. Proposals which are considered to have a likely significant effect on these sites will require an Appropriate Assessment (AA) in line with European and domestic legislation. Developers should provide information sufficient to inform this assessment. Planning permission will only be granted if, in light of the AA, it can be ascertained that the development would not adversely affect the integrity of these sites or, if there are no alternative solutions, imperative reasons of overriding public interest can be demonstrated. In accordance with the Habitats Regulations, development proposals should follow the avoid-mitigate-compensate hierarchy. Where this cannot be achieved, development proposals will not be permitted… <u>Nationally Designated Sites</u> Sites designated for their national importance to nature conservation; including Sites of Special Scientific Interest (SSSIs) should also be protected from development which is likely to adversely affect the features for which they are designated. Where necessary, developers should therefore ensure that sufficient assessment of potential impacts to SSSIs is also submitted with any planning application. <u>Locally Designated Sites</u> Proposals likely to have an adverse effect on a Local Wildlife Site (LWS), Local Nature Reserve (LNR) and Special Roadside Verge will not be permitted unless the benefits of the development clearly outweigh the harm to the nature conservation value of the site. If such benefits exist, the developer will be required to demonstrate that	features such as protected species and habitats during both the construction and operation (including maintenance). The Project has been designed in a way which prioritises the retention and conservation of significant trees, woodlands and orchards. Owing to the size of the Project it has not been possible to completely avoid the loss of such natural features, therefore an Ancient Woodland and Veteran Tree Strategy Report (Appendix E to the Outline LEMP (document reference 7.4)) has been prepared to support the application for development consent. In relation to Ancient Woodlands, the physical extent of each ancient woodland along the Project has been mapped based on a combination of aerial imagery and based on information obtained from the ground truthing woodland surveys. Table 8.23 in ES Chapter 8: Ecology and Biodiversity (document reference 6.7) lists the Ancient Woodlands identified within a 200m of the Project's Order Limits and identifies the proposed mitigation measure/commitment. The location and further information relating to all Ancient Woodlands is presented within Appendix 8.1: Habitats Report and presented on Figure A8.1.3: Ancient Woodland Locations (document reference 6.8.A1). In addition, the Project has considered 11 woodlands to be Ancient Woodland within ES Chapter 8: Ecology and Biodiversity (document reference 6.8) due to the Local Wildlife Site citations mentioning these woodlands support ancient woodland features. These woodlands have therefore been included in the impact assessment as Ancient Woodland. Potential impacts (excavation and non-excavation), in the absence of mitigation, were identified at 10 ancient woodland parcels. As a result of these Project commitments impacts associated with five ancient

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	impacts will be avoided, and impacts that cannot be avoided will be mitigated on-site. Protected Species, Priority Species and Priority Habitat Proposals that result in a net gain in priority habitat will be supported in principle, subject to other policies in this plan. Where priority habitats are likely to be adversely impacted by the proposal, the developer must demonstrate that adverse impacts will be avoided, and impacts that cannot be avoided are mitigated on-site. Where residual impacts remain, off-site compensation will be required so that there is no net loss in quantity and quality of priority habitat in Braintree District. Where there is a confirmed presence or reasonable likelihood of protected species or priority species being present on or immediately adjacent to a development site, the developer will be required to undertake an ecological survey and will be required to demonstrate that an adequate mitigation plan is in place to ensure no harm to protected species and no net loss of priority species. Proposals resulting in the loss, deterioration or fragmentation of irreplaceable habitats such as ancient woodland or veteran trees will not normally be acceptable unless the need for, and benefits of the development in that location clearly outweigh the loss. All development proposals In all cases a precautionary approach will be taken where insufficient information is provided about avoidance, management, mitigation and compensation measures. Management, mitigation and compensation measures will be secured through planning conditions/obligations where necessary".	woodlands have been completely avoided. The remaining 5 ancient woodlands (and the associated 15 m buffer) is unavoidable as all proposed works relate to the removal, undergrounding or modification of existing third-party infrastructure (11 kV, 33 kV, 132 kV), with the existing assets already located within the associated woodland or root protection zone. Out of the remaining ancient woodlands 1 woodland Rivenhall Thicks is located within Braintree District (Section E of the Project route). The Order Limits interacts with the ancient woodland due to the works area for existing 33 kV overhead line requiring removing and undergrounding of new cable 3 m from the woodland. It should be noted that long-term benefit to the woodland is predicted because of removing dismantling the existing 33 kV line. A comprehensive explanation of the Project approach to ancient woodland avoidance and minimisation of impact on ancient woodland is detailed in Appendix B: Ancient Woodland and Veteran Tree Strategy (document reference 7.4.B) With regard to veteran trees, a desk study was undertaken to determine the location of veteran trees recorded within 30 m of the Order Limits. An arboricultural survey was also undertaken between May 2023 and May 2025. Figure 7.4.A13 shows the location of veteran trees. A full record of the identified veteran trees is included in Table 7.3 of the Outline LEMP (document 7.4). The Ancient Woodland and Veteran Tree Strategy Report states that based on the existing overhead line alignments without considering the LoD this is an initial assessment of veteran tree removals and impacts and all attempts should be made during detailed design to retain veteran trees where practicable (see commitment B18 in the CoCP (document reference 7.2). Ancient Woodland and Veteran Tree Strategy Report details the management outcomes for veteran trees. The

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		final mitigation measures, remediation works and long-term monitoring are to be agreed at detailed design stage with the Project arboriculturist and the relevant landowners on a case-by-case basis. All management options discussed for veteran trees need to be achievable and therefore will need landowner consent and agreement with National Grid. Protection measures are to be in place prior to the commencement of construction or pre-construction works and require sign off by the Project Arboriculturist.
LPP 65 – Tree Protection	"The Council will consider the protection of established healthy trees which offer significant amenity value to the locality by: • Assessing the value and contribution made by trees to the Conservation Areas in which they are located when determining S211 notifications for works to trees, including their removal; and • Serving Tree Preservation Orders in response to an objection to such a notification or in other circumstances as detailed below. Prominent trees which contribute to the character of the local landscape and are considered to have reasonable life expectancy will be protected by tree preservation orders particularly if they are considered to be under threat from removal. Trees which make a significant positive contribution to the character and appearance of their surroundings will be retained unless there is a good arboricultural reason for their removal for example they are considered to be dangerous or in poor condition. Similarly alterations to trees such as pruning or crown lifting should not harm the tree or disfigure it; any tree surgery should be carried out to reflect BS3998:2010 (as superseded).	National Grid has undertaken an Arboricultural Impact Assessment (ES Appendix 13.6, document reference 6.13.A6) in accordance with British Standard 5837:2012 Trees in Relation to Design, Demolition and Construction. This has identified trees that offer significant amenity value which the Project has sought to avoid, where practicable. In addition, an Ancient Woodland and Veteran Tree Strategy (Appendix E of the Outline LEMP (document reference 7.4)) has been produced to detail the environmental measures that will be implemented to avoid, minimise, mitigate and compensate the ancient and/ or veteran features likely to be impacted during construction and operation. Within Braintree District, the Arboricultural Impact Assessment notes that a number of high and moderate quality features will be affected. A total of 11 individual trees and 5 groups of trees will be removed; 23 groups of trees will also be partly removed; 7 individual trees and 3 groups of trees will be affected / managed as part of the proposals and 39 individual trees and 3 groups of trees will be retained with protection measures. The Project has been designed to avoid impacting on trees and vegetation where reasonably possible. However, unavoidable tree loss will be compensated through the

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	When considering the impact of development on good quality trees the Council will expect developers to reflect the best practice guidance set out in BS5837:2012 (as amended). The standard recommends that trees of higher quality are a material consideration in the development process. Where trees are to be retained on new development sites there must be a suitable distance provided between the established tree and any new development to allow for its continued wellbeing and ensure it is less vulnerable to pressures from adjacent properties for its removal. Planning conditions will be applied to protect trees during development. New landscape proposals for tree planting on development sites should reflect the recommendations set out in BS5837:2012 (as amended) and BS8545:2014 (as superseded)". In considering works to trees, new planting and the trees in new development schemes the Council will expect proposals to be in general conformity to and contribute to the aims of Braintree District's Tree Strategy.	implementation of landscape design including new tree planting (refer to Outline LEMP (document reference 7.4) which sets out the principal measures that are required to help avoid, minimise, mitigate and compensate (where relevant) the impacts to vegetation. The Project would contribute to the aims of Braintree District's Tree Strategy by maintaining where possible trees through sensitive routing to avoid tree loss, and compensating any loss of trees through compensatory planting at a 3:1 ratio thus promoting a sustainable tree population. In addition, the Project would use best practice in arboriculture and forestry as set out in the Outline LEMP (document reference 7.4).
LPP 66 – Protection, Enhancement, Management and Monitoring of Biodiversity	"Development proposals shall provide for the protection of biodiversity and the mitigation or compensation of any adverse impacts. Additionally, enhancement of biodiversity should be included in all proposals, commensurate with the scale of the development. For example, such enhancement could include watercourse improvements to benefit biodiversity and improve water quality, habitat creation, wildlife links (including as part of green or blue infrastructure) and building design which creates wildlife habitat (e.g. green roofs, bird or bat boxes as integral parts of buildings in partnership with organisations such as The Swift Conservation Group and Essex Wildlife Trust).	The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) presents the assessment of the likely significant ecology and biodiversity effects that could result from the Project. The chapter concludes there will be some temporary impact associated with the construction phase to both statutory designated sites and non-statutory designed sites. These temporary impacts will be mitigated through the standard mitigation measures set out in the Outline

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	Previously developed land (brownfield sites) can harbour biodiversity. The reuse of such sites must be undertaken carefully with regard to existing features of biodiversity interest. Development proposals on such sites will be expected to include measures that maintain and enhance important features and appropriately incorporate them within any development of the site. If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or as a last resort, compensated for, then planning permission should be refused".	CoCP (document reference 7.2) which will remove potential significant effects associated with dust, noise and hydrological effects on most statutory designated sites within the Study Area. Where the construction phase results in temporary habitat damage or loss the habitat will be reinstated post-construction ensuring there would be no long-term adverse impact. Some of the woodland habitats cannot be replaced due to safety clearances and therefore, mitigation in the form of compensation planting is proposed. The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats during the construction and operation (including maintenance). In addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1). There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required.
LPP 67 – Landscape Character and Features	"In its decision-making on applications, the Local Planning Authority will take into account the different roles and character of the various landscape areas in the District, and recognise the intrinsic character and beauty of the countryside, in order to ensure that any	The full assessment of the potential residual effects of the Project on landscape and visual amenity is contained in ES Chapter 13: Landscape and Visual (document reference 6.13) and ES Appendix 13.2: Landscape Baseline and Assessment (document reference 6.13.A2), ES Appendix

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	development permitted is suitable for the local context. In doing so regard must be given to the hierarchy of designations as expressed in NPPF 2012 paragraph 113. At a landscape scale, Braintree is located primarily in the South Suffolk and North Essex Clayland National Character Area and this character assessment is relevant in considering applications for development. Proposals for new development should be informed by, and be sympathetic to, the character of the landscape as identified in the District Council's Landscape Character Assessments. Proposals which may impact on the landscape such as settlement edge, countryside or large schemes will be required to include an assessment of their impact on the landscape and should not be detrimental to the distinctive landscape features of the area such as trees, hedges, woodlands, grasslands, ponds and rivers. Development which would not successfully integrate into the local landscape will not be permitted. Where development is proposed close to existing features, it should be designed and located to ensure that the condition and future retention/management will not be prejudiced but enhanced where appropriate. Additional landscaping including planting of native species of trees, hedgerows and other flora may be required to maintain and enhance these features. The restoration and enhancement of the natural environment will be encouraged through: • Maximising opportunities for creation of new green infrastructure and networks in sites allocated for development; and	13.3: Visual Baseline and Assessment (document reference 6.13.A3) and ES Appendix 13.4: Residential Visual Amenity Assessment (document reference 6.13.A4). The landscape and visual amenity assessments indicate that the construction phases would result in significant negative landscape and visual amenity effects during construction. These significant effects are related to the introduction of construction activity and equipment, including the loss of some landscape features including farmland and field boundary vegetation. ES At Year 15 of operation, following the maturation of mitigation planting and the Environmental Area proposed around Fairstead (EACN side) and Fairstead (Tilbury side) CSE (both located in Braintree District), the assessment concludes that significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure projects, as set out in Paragraphs 5.10.5 and 5.10.13 of NPS EN-1. The Project has been designed carefully, and incorporates measures to mitigate harm to landscape and visual receptors, having regard to National Grid's statutory duty under Schedule 9 of the Electricity Act 1989 (in line with Paragraph 2.2.10 of NPS EN-5). However, some significant residual landscape and visual adverse effects will remain, as is inevitable with nationally significant energy infrastructure of the scale and type proposed. In the case of CNP infrastructure (such as the Project), "these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure".

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	• Creating green infrastructure networks to link urban areas to the countryside, and creating and enhancing the biodiversity value of wildlife corridors. Development proposals which result in harm to the setting of the AONB will not be permitted. Development proposals which result in harm to the setting of the AONB will not be permitted".	With regards to restoration and enhancement of the natural environment, in addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. National Grid is seeking to deliver net gain by at least 10% or greater in environmental value, including BNG, on this project. Further details can be found in the Biodiversity Net Gain Report (document reference 7.1).
LPP 69 – Protected Lanes	"The District Council will conserve the traditional landscape and nature conservation character of roads designated on the Proposals Map as Protected Lanes, including their verges, banks, ditches and natural features such as hedgerows, hedgerow trees and other structural elements contributing to the historic features of the lanes. Any proposals that would have a materially adverse impact on the physical appearance of these Protected Lanes or generate traffic of a type or amount inappropriate for the traditional landscape and nature conservation character of a protected lane, will not be permitted".	Within Braintree there are a number of Protected Lanes in proximity to the Project. The Project has sought to avoid works at Protected Lanes where practicable. However, during construction, works will be required at: • Fairstead Road • Fairstead Lodge Road The above protected lanes would be oversailed by the Project and have temporary bellmouths installed or potentially existing accesses widened to allow access for construction vehicles into the Fairstead (Tilbury Side) CSEC and the Fairstead (EACN side). ES Appendix 13.2: Landscape Baseline and Assessment (document reference 6.13.A2) found that the construction activities would result in the loss of hedgerows, field trees, hedgerow trees, and riparian vegetation which contribute to the character of the landscape. As there will be underground cables associated with the CSEC and EACN replacement tree planting above the cable corridors will not be possible therefore there will be permanent loss of natural features above the cable corridors. Compensatory tree planting in other locations within the Order Limits will be delivered to offset the loss of natural features. Although tree planting directly above the cables between Fairstead (EACN side) and Fairstead

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		(Tilbury side) CSE compounds could not be reinstated, hedgerows would be replaced across the LCA. In the longer term, proposed planting within the Environmental Area around Fairstead (EACN side) and Fairstead (Tilbury side) CSE compounds would reduce effects. Localised landscape benefits would arise from the undergrounding of short sections of existing overhead lines. At year 15, proposed planting would be semi-mature, helping to integrate Fairstead (EACN side) and Fairstead (Tilbury side) CSE compounds within the surrounding landscape in the middle area. Impacts to Protected Lanes during the operational stage have been discounted from consideration, given that National Grid has committed to restoring landscape feature requiring removal during construction where possible. For instance, historic hedgerows will be restored, as will historic earthworks contributing to the Protected Lane. There will also be no material increase in traffic using the Protected Lanes during the operational stage. Vegetation, earthworks (such as banks or ditches) and other boundary features (such as walls or fencing) that border protected lanes, as designated by Local Authorities, will be reinstated as close to their pre-construction condition as possible as set out in the commitments of the Outline CoCP (document reference 7.2). Pre-construction photographs will be taken to ensure a record is available to inform any reinstatement. ES Appendix 13.2: Landscape Baseline and Assessment (document reference 6.13.A2), ES Appendix 13.3: Visual Baseline and Assessment (document reference 6.13.A3) and ES Appendix 13.4: Residential Visual Amenity Assessment (document reference 6.13.A4) provides an assessment of the landscape and visual impacts on Protected Lanes.

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LPP 70 – Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards	"Proposals for all new developments should prevent unacceptable risks from all emissions and other forms of pollution (including light and noise pollution) and ensure no deterioration to either air or water quality. All applications for development where the existence of, or potential for creation of, pollution is suspected must contain sufficient information to enable the Local Planning Authority to make a full assessment of potential hazards. Development will not be permitted where, individually or cumulatively and after mitigation, there are likely to be unacceptable impacts arising from the development on: a) The natural environment, general amenity and the tranquillity of the wider rural area b) The health and safety of the public including existing residents, and future occupiers of all new developments c) Air quality d) Surface water and groundwater quality, groundwater source protection areas, drinking water protected zones e) Odour f) Compliance with statutory environmental quality standards g) Noise Development will be permitted when there is no unacceptable risk due to: a) Siting on known or suspected unstable land b) Siting on land which is known to be or potentially affected by contamination or where the land may have a particularly sensitive end use	The Project accords with this policy as set out below, where the relevant sub-parts of this policy are identified: In relation to light pollution, ES Chapter 8: Ecology and Biodiversity (document reference 6.8) and ES Chapter 13: Landscape and Visual (document reference 6.13) presents the assessment of likely significant ecology and biodiversity, and landscape and visual effects that could result from the Project including lighting impacts. The assessment of lighting in both these ES chapters has been based on the assumptions that: All lighting would be designed in accordance with the appropriate design standards and be motion-sensor activated. A typical construction day will consist of 12-hours meaning in winter this would require working in the dark at either end of the day. For the purposes of the ES, it is therefore assumed that winter working will require lighting at certain sites but will not be wide scale across the Project. The Outline CoCP (document reference 7.2) sets out the good practice measures to protect Ecology, Biodiversity, and Landscape and Visual environments during construction and operation. Key measures include directional and minimised construction lighting (LV03), locating potentially disruptive activities and equipment away from sensitive receptors like residential areas and ecological sites where practicable (GG22), designing permanent lighting to minimise impacts on adjacent properties, protected species, and habitats (GG31), and ensuring construction lighting is switched off when not in use and positioned to avoid spillover onto nearby land or vegetation (B06). (b) ES Chapter 10: Health and Wellbeing (document reference 6.10) details the assessment of the potential residual effects of the Project on Health and Wellbeing. The

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	c) The storage or use of hazardous substances Proposals for development on, or adjacent to land which is known to be potentially affected by contamination, or land which may have a particular sensitive end use, or involving the storage and/or use of hazardous substances, will be required to submit an appropriate assessment of the risk levels, site investigations and other relevant studies, remediation proposals and implementation schedule prior to, or as part of any planning application. Soil quality must be protected during development to protect good quality land and to protect the ability of soil to allow water penetration by avoiding compaction. In appropriate cases, the Local Planning Authority may impose planning conditions, or through a legal obligation, secure mitigation measures, remedial works and/or monitoring processes".	assessment includes a series of embedded and standard mitigation measures considered as part of the integral environmental appraisal considered from the outset. Section 10.7 of ES Chapter 10 demonstrates that the likely significant effects of the Project can be mitigated through the proposed measures, such to comply with National, Regional and Local Policy. These measures have been informed through the engagement and consultation activities that have taken place with stakeholders, which has helped to provide for a well-informed approach that takes into account local demographics and health considerations. (c) The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. ES Chapter 7: Air Quality (document reference 6.7) assesses the likely air quality effects that would result from the Project and considers the existing baseline conditions and the likely changes and effects to air quality levels during the construction phase. As set out in the Scoping Report (document reference 6.19) and agreed within the Scoping Opinion (document reference 6.20), the operational phase of the Project will not result in any significant impacts to air quality and no further assessment has been carried out in the ES. The assessment confirms that with the implementation of the proposed standard mitigation measures, the effects of construction on air quality in regard to dust soiling, and human health effects are anticipated to be not significant. (d) With regard to surface water and groundwater Table 6.1 of the Outline CoCP (document reference 7.2) sets out the measures that will be implemented to safeguard surface

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		water and groundwater water quality and manage land drainage and flood risk during construction of the Project. It contains all of the necessary measures that would be set out in a standalone Construction Surface Water Management Plan. The Plan will demonstrate how runoff across the site will be controlled to prevent any off-site increases in flood risk. (e) As identified in the Statement of Statutory Nuisance (document reference 5.4) it is not anticipated that construction activities would give rise to any material amounts of steam, smell or other effluvia. (g) ES Chapter 14: Noise and Vibration (document reference 6.14) presents the assessment of the likely significant noise and vibration effects that could result from the construction of the Project. The Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects in accordance with Paragraph 4.1.5 of NPS EN-1. The assessment concluded with the relevant standard mitigation measures and best practicable means (BPM) set out in Appendix F: Outline Noise and Vibration Management Plan to the Outline CoCP (document reference 7.2) relating to noise and vibration the residual effect of construction noise will not be significant to all nearby NSRs during both daytime and nighttime periods. Further detailed construction noise and vibration assessments will be undertaken by the main works contractor(s) prior to commencing works. Operational noise from overhead lines is scoped out of the ES, in accordance with the Scoping Opinion (document reference 6.20), on the basis that a low noise conductor system is proposed. However, additional information regarding operational noise impacts from the overhead

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		lines is provided for information in ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) (document reference 6.14.A5) respectively. With regard to contamination land ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9) considers land contamination and is supported by a Preliminary Contamination Risk Assessment (PRA) (ES Appendix 9.1: Baseline Information and Preliminary Contamination Risk Assessment (document reference 6.9.A1)). The PRA has identified a generally 'very low/low risk' of significant existing contamination to be present within most of the Order Limits. A worst case 'very high' risk has been identified within small discrete sections of the Order Limits. Prior to construction, these sites will be individually investigated and assessed in accordance with Land Contamination Risk Management (Environment Agency, 2023)) to determine any additional mitigation measures or remediation requirements. The nature and scope of any mitigation or remediation would be agreed with the Environment Agency and Local Authority (as appropriate). Standard mitigation measures within the Outline CoCP (document reference 7.2) will be adopted during construction to deal with unexpected land contamination. With regard to soil quality, proposed soil handling measures are set out in the Outline CoCP (document reference 7.2), and accompanying Outline Soil Resource Plan (Appendix C of the Outline CoCP) to reduce the potential negative impacts on soils which are handled and disturbed, such as those to protect the quality of soils when they are stripped, stockpiled and restored. Measures are also proposed to reduce the disruption to agricultural activities - for example, AS01 (Soil Management Measures) and AS05 (consultation

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		with affected landowners), with all land required temporarily being returned to its preconstruction condition. The Project will control potential contamination from the storage and use of hazardous substances by implementing measures set out in the Outline CoCP (document reference 7.2). ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9) concludes that there is generally a 'very low/low risk' of significant existing contamination to be present within most of the Order Limits. A worst case 'very high' risk has been identified within small discrete sections of the Order Limits none of which lie within Section E of the route. Significant effects on soil quality will be minimised through the use of monitoring techniques as set out in Section 6.8 of ES Chapter 6: Agriculture and Soils (document reference 6.6) and mitigation measures set out in the Outline CoCP (document reference 7.2).
Policy LPP 71 – Climate Change	"The Council will adopt strategies to mitigate and adapt to climate change. In addressing the move to a low carbon future for Braintree District, the Council will plan for new development in locations and ways that reduce greenhouse gas emissions. Applicants will be expected to demonstrate that measures to lower carbon emissions, increase renewable energy provision and adapt to the expected impacts of climate change have been incorporated into their schemes, other than for very minor development. Planning permission will only be granted for proposals that demonstrate the principles of climate change mitigation and adaptation into the development. Guidance will be made available by the Council on the contents to be included in the Sustainability Statement...".	The Project is needed to support the connection and transfer of green, renewable energy into the NETS network. The Project would support the UK's net zero target to achieve net zero emissions by 2050 through the connection in East Anglia of new low carbon energy generation, and by reinforcing the transmission network. A Greenhouse Gas Assessment (document reference 6.4.A2) has been prepared in support of the Project. This identifies the carbon dioxide equivalent emissions that would be released during the construction and operation of the Project. The assessment concludes that the construction and operational CO2e numbers are not considered to have a material impact on the ability of the Government to meet its carbon reduction targets and therefore are not significant. Therefore, the operational, medium to long term benefits of delivering the Project on a

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		national level are considered to outweigh any short-term impacts of greenhouse gas (GHG) emissions because of material use and construction activities.
Policy LPP 74 – Flooding Risk and Surface Water Drainage	"Where development must be located in an area of higher flood risk, it must be designed to be flood resilient and resistant and safe for its users for the lifetime of the development, taking climate change and the vulnerability of the residents into account. New development shall be located on Flood Zone 1 or areas with the lowest probability of flooding, taking climate change into account, and will not increase flood risk elsewhere. Any proposals for new development (except water compatible uses) within Flood Zones 2 and 3a will be required to provide sufficient evidence for the Council to assess whether the requirements of the sequential test and exception test have been satisfied, taking climate change into account. Where development must be located in an area of higher flood risk, it must be designed to be flood resilient and resistant and safe for its users for the lifetime of the development, taking climate change and the vulnerability of any residents into account. For developments within Flood Zones 2 and 3, and for developments elsewhere involving sites of 1ha or more, development proposals must be accompanied by a site specific Flood Risk Assessment which meet the requirements of the NPPF and Planning Practice Guidance. Flood Risk Assessments submitted must take into account an assessment of flood risk across the life of the development taking climate change into account by using the most up to date allowances available".	The FRA (document reference 7.9) has been submitted as part of the application for development consent focussing on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. A sequential approach has been taken in siting the Project. ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) confirms that the parts of the Project located in Braintree District Council (Section E of the Project route) area are mostly located in Flood Zone 1, comprising of pylons and one CSE compound. As addressed in the FRA (document reference 7.9), there is one pylon proposed in the floodplain in Section E that would need compensatory storage. The requirements for compensation of loss of floodplain storage associated with these pylons is addressed in the following sub-section and secured by commitment W17 in the Outline CoCP (document reference 7.2). The Risk of Flooding from the Surface Water map shows that the majority of land within Section E is at very low risk of surface water flooding. As shown in the FRA (document reference 7.9), where there are interactions between the Project and any high-risk zone during construction, these are mostly where temporary haul roads and pylon construction working areas are proposed. The Risk of Flooding from Surface Water map shows that most of the land within Section E is at very low risk of surface water flooding. As shown in the FRA (document reference 7.9), where there are interactions between the Project and the high-risk zone during construction, these are mostly where

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	For all developments (excluding minor developments and change of use) proposed in Flood Zone 2 or 3, a Flood Warning and Evacuation Plan should be prepared. For developments located in areas at risk of fluvial flooding, safe access/egress must be provided for new development as follows in order of preference: a. Safe dry route for people and vehicles b. Safe dry route for people c. If a. is not possible a route for people where the flood hazard is low and should not cause risk to people d. If a-c is not possible planning permission will not usually be granted. All new development in Flood Zones 2 and 3 should not adversely affect flood routing and thereby increase flood risk elsewhere. All new development in Flood Zones 2 and 3 must not result in a net loss of flood storage capacity. Where possible opportunities must be sought to achieve an increase in floodplain storage. All more Vulnerable and Highly Vulnerable development within Flood Zones 2 and 3 should set finished floor levels 300mm above the known or modelled 1 in 100 annual probability (1% AEP) flood level including an allowance for climate change. In areas at risk of flooding at low depths (<0.3m), flood resistance measures should be considered as part of the design and in areas at risk of frequent or prolonged flooding, flood resilience measures should also be included. Where applicable proposals for new development should:	temporary haul roads and pylon construction working areas are proposed. Detail on the Sequential and Exception Test are provided in Sections 5.1 and 5.2 of the FRA (document reference 7.9) submitted as part of the application for development consent. The Project is classified as 'essential infrastructure' with respect to flooding vulnerability in the NPPF. The infrastructure which represent the parts of the Project that are most vulnerable to flooding, are situated in Flood Zone 1, satisfying the Sequential Test. The FRA has concluded that the Project during its construction would be generally at low risk of flooding from rivers. Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures. These measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk. During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the FRA. Above ground structures such as pylons and below ground structures such as the underground cable are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. In accordance with the requirement of this paragraph Appendix G Outline Flood Warning and Evacuation Plan of the Outline CoCP (document reference 7.2). The Outline Flood Warning and Evacuation Plan live document subject to regular update and review, sets out flood emergency arrangements during the construction phase and provides

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	• Demonstrate that the scheme does not have an adverse impact on any watercourse, floodplain or flood defence • Not impede access to flood defence and management facilities • Demonstrate that the cumulative impact of development would not have a significant effect on local flood storage capacity or flood flows • Where appropriate opportunities may be taken to reduce wider flood risk issues by removing development from the floodplain through land swapping Where applicable retain at least an 8m wide undeveloped buffer strip alongside Main Rivers, or at least a 3m buffer strip on at least one side of an Ordinary watercourse, and explore opportunities for riverside restoration • Ensure there is no adverse impact on the operational functions of any existing flood defence infrastructure and new development should not be positioned in areas which would be in an area of hazard should defences fail. Where the development site would benefit from the construction of Flood Management Infrastructure such as Flood Alleviation Schemes, appropriate financial contributions will be south".	information for construction Site Manager(s) and on-site personnel on how to respond to a warning of a fluvial and / or surface water flood event. This Outline FWEP complements the Flood Risk Assessment (FRA) (document reference 7.9) and will be updated by the Main Works Contractor(s) into a full FWEP prior to the commencement of construction.
Policy LPP 75 – Surface Water Management Plan	"The Council will require development to have regard to and contribute positively towards delivering the aims and objectives of the Braintree and Witham Surface Water Management Plan as updated. Developments located in Critical Drainage Areas (CDAs), Local Flood Risk Zones (LFRZs) and for redevelopments of more than one property or area greater than 0.1	The Outline CoCP (document reference 7.2) describes the good practice measures including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for

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	hectare should seek betterment to a greenfield runoff rate. All developments in Critical Drainage Areas (excluding minor housing extensions less than 50m2) which relate to a net increase in impermeable area must include at least one 'at source' SUDs measure (e.g. water butt, permeable surface). This is to assist in reducing the peak volume of discharge from the site".	the Project's lifetime. The FRA (document reference 7.9) states that access roads and haul roads, as well as areas where impermeable material will be installed in areas where heavy equipment would be used, will also have suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff. In relation to Critical Drainage Areas, the Order Limits avoid encroaching into such areas.
LPP 76 Sustainable Urban Drainage Systems	"All new development of 10 dwellings or more and major commercial development, car parks and hard standings will incorporate Sustainable Drainage Systems (SuDs) appropriate to the nature of the site. Such systems shall provide optimum water runoff rates and volumes taking into account relevant local or national standards and the impact of the Water Framework Directive on flood risk issues, unless it can be clearly demonstrated that they are impracticable. SuDs design quality will be expected to reflect the up-to-date standards encompassed in the relevant BRE and CIRIA standards, Essex County Council SuDs Design Guide (as updated) and Non-Statutory Technical Standards for Sustainable Drainage Systems, to the satisfaction of the Lead Local Flood Authority. Large development areas with a number of new allocations will be required to develop a strategy for providing a joint SuDs scheme. Surface water should be managed as close to its source as possible and on the surface where practicable to do so. Measures such as rain water recycling, green roofs, water butts and permeable surfaces will be encouraged incorporating measures to prevent pollution where appropriate.	The Outline CoCP (document reference 7.2) describes the good practice measures including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime. The FRA (document reference 7.9) states that access roads and haul roads, as well as areas where impermeable material will be installed in areas where heavy equipment would be used, will also have suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff appropriate to local conditions. Appendix C of the FRA (document reference 7.9) contains further details on SuDS.

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	Only where there is a significant risk of pollution to the water environment, inappropriate soil conditions and/or engineering difficulties, should alternative methods of drainage be considered. If alternative methods are to be considered, adequate assessment and justification should be provided and consideration should still be given to pre and post runoff rates. SuDS design should be an integral part of the layout and clear details of proposed SuDS together with how they will be managed and maintained will be required as part of any planning application. Only proposals which clearly demonstrate that a satisfactory SuDs layout with appropriate maintenance is possible, or compelling justification as to why SuDs should not be incorporated into a scheme, or are unviable, are likely to be successful. Contributions in the form of commuted sums may be sought in legal agreements to ensure that the drainage systems can be adequately maintained into the future. The SuDS should be designed to ensure that the maintenance and operation requirements are economically proportionate. The dual use of land for Sustainable Urban Drainage and Open Space can be supported where neither use is compromised by the other. It may be supported in circumstances where land is safely usable by the public as open space, and where use as open space does not compromise the efficient and effective functioning of the SuDs in the short or longer term".	
LPP 77 External Lighting	"Proposals for external lighting within development proposals and standalone lighting schemes, will be permitted where all the following criteria are met:	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) and ES Chapter 13: Landscape and Visual (document reference 6.13) present the assessment of likely significant ecology and biodiversity, and landscape and

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	a) The lighting is designed as an integral element of the development and shall be capable of adoption by the Highway Authority when it is on the public highway b) Low energy lighting is used in conjunction with features such as movement sensors, daylight sensors and time controls, and hours of illumination shall be controlled c) The alignment of lamps and provision of shielding minimises spillage, glare and glow, including into the night sky d) The lighting intensity is no greater than necessary to provide adequate illumination e) There is no loss of privacy or amenity to nearby residential properties and no danger to pedestrians and road users There is no harm to biodiversity, natural ecosystems, intrinsically dark landscapes and/or heritage assets".	visual effects that could result from the Project including lighting impacts. The assessment of lighting in both these ES chapters has been based on the assumptions that: All works associated with substation - exterior and interior lighting would be provided at the site to allow for safe movement and the operation of equipment. All lighting would be designed in accordance with the appropriate design standards and be motion-sensor activated. A typical construction day will consist of 12-hours meaning in winter this would require working in the dark at either end of the day. For the purposes of the ES, it is therefore assumed that winter working will require lighting at certain sites but will not be wide scale across the Project. The Outline CoCP (document reference 7.2) contains relevant good practice measures relating to Ecology and Biodiversity, and Landscape and Visual. These measures include – LV03: Construction lighting will be directional and minimised where possible; GG22: Any activity carried out or equipment located within a temporary construction compound that may produce a noticeable nuisance, including but not limited to dust, noise, vibration, and lighting, will be located away from sensitive receptors such as residential properties or ecological sites where reasonably practicable; GG31: Permanent lighting will be designed, positioned, and directed to reduce the intrusion into adjacent properties, protected species, and habitats. Task specific lighting will be assessed and considered by all necessary specialists to also so far as is reasonably practicable be directed to

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		reduce intrusion; and B06: Lighting used for construction must be switched-off when not in use and positioned to minimise spill on to adjacent land or retained vegetation.
Chelmsford Local Plan (2020)		
Strategic Policy S1 – Spatial Principles	"The Council will require all new development to accord with the following Spatial Principles where relevant… • Locate development to avoid or manage flood risk • Protect the Green Belt • Respect the character and appearance of landscapes and the built environment, and preserve or enhance the historic environment and biodiversity… …"	The spatial principles set out in this policy aim to provide guidance to a range of developments however only the principles included in the policy text are considered relevant to the Project. The Project has sought to avoid and manage flood risk, ES Chapter 12: Hydrology and Land Drainage (document reference 6.12) concludes that the Project has sought to avoid siting any infrastructure in areas at risk of flooding. The majority of the permanent Project infrastructure would be located outside of the areas shown to be at 'high' risk of surface water flooding in the Environment Agency Surface Water Map. Of the places where the Project interacts with the high-risk zone for operation, the majority of these are access roads. Surface water runoff from construction sites, haul roads and operational assets would be managed using SuDS techniques appropriate to local conditions (see Appendix C of the FRA (document reference 7.9)) and through standard mitigation measures set out in the outline Code of Construction Practise (document reference 7.2). The Project is routed through the Metropolitan Green Belt between Chelmsford and the new Tilbury North Substation in Thurrock. An assessment on the Green Belt can be found in the Planning Statement (document reference 5.6). The assessment in the Planning Statement concludes that the overhead line infrastructure should be considered to be an engineering operation and as such should not be regarded as inappropriate development in the Green Belt.

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		The Project has sought to respect the character and appearance of landscapes by including embedded measures (listed in ES Chapter 13 Landscape and Visual (document reference 6.13) into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project through consideration of route corridors and the application of design principles as set out in the Design and Access Statement (document reference 7.15) and ES Chapter 3: Alternatives (document reference 6.3). With regards to preserving the historic environment ES Chapter 11 Historic Environment (document reference 6.11) reports the assessment of the likely significant historic environment effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. The ES Chapter concludes that the Project would not result in substantial harm to any heritage assets. Within Chelmsford the Project would result in a permanent significance of effect (considered to constitute less than substantial harm) to three listed buildings and The Langleys Registered Park and Garden.
Strategic Policy S2 – Addressing Climate	"The Council, through its planning policies and proposals that shape future development, will seek to mitigate and adapt to climate change. In addressing the move to a	The proposal is a vital part of the transition to net zero and is Critical National Priority Infrastructure. Due to the growth in offshore wind generation, there has been a significant number of connections planned in the East Anglian and

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Change and Flood Risk	lower carbon future for Chelmsford, the Council will encourage new development that: • Reduces greenhouse gas emissions • Promotes the efficient use of natural resources such as water • Reduces the need to travel and provides for sustainable transport modes • Encourages design and construction techniques which contribute to climate change mitigation and adaptation. • Minimises impact on flooding • Provides opportunities for green infrastructure including city greening, and new habitat creation. The Council will require that all development is safe, taking into account the expected life span of the development, from all types of flooding and appropriate mitigation measures are identified, secured and implemented. New development should not worsen flood risk elsewhere".	south-east coastal areas of England. As such, the network requires significant reinforcement to provide the connections of more offshore wind on the east coast. A Greenhouse Gas Assessment (document reference 6.4.A2) has been prepared in support of the Project. This identifies the carbon dioxide equivalent emissions that would be released during the construction and operation of the Project. The assessment concludes that the construction and operational CO2e numbers are not considered to have a material impact on the ability of the Government to meet its carbon reduction targets and are therefore not significant. Therefore, the operational, medium to long term benefits of delivering the Project on a national level are considered to outweigh any short-term impacts of greenhouse gas (GHG) emissions because of material use and construction activities. Water efficiency is considered in the Outline CoCP (document reference 7.2). Commitment W16 sets out the water supply and efficiency commitments which will be adopted during construction. The Project has sought to reduce the need for construction staff to travel using a private car. The Project has sought to reduce through traffic in town centres by requiring construction staff to travel via defined PARs for construction staff travelling to dedicated construction areas as set out in the Outline CTMP (document reference 7.3). These routes have sought to avoid town centres. Further measures will be adopted during construction to encourage all staff to move away from reliance on single occupancy private car travel, these are set out in Section 5 of the Outline CTMP. The Project will utilises design techniques which contribute to climate change mitigation such as SuDS. Of the places where the Project interacts with the high-risk zone for

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		operation, the majority of these are access roads. Surface water runoff from construction sites, haul roads and operational assets would be managed using SuDS techniques appropriate to local conditions (see Appendix C of the FRA (document reference 7.9)) and through standard mitigation measures set out in the outline Code of Construction Practise (document reference 7.2). With regard to how the Project will minimis impact on flooding see response to Strategic Policy S1 – Spatial Principles above. The Project provides opportunity for green infrastructure by providing mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. Although there is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required the Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1).
Strategic Policy S3 – Conserving And Enhancing The Historic Environment	"The Council will conserve and where appropriate enhance the historic environment recognising the positive contribution it makes to the character and distinctiveness of Chelmsford through the diversity and quality of heritage assets. This includes wider social, cultural, economic and environmental benefits. The Council will designate and keep under review Conservation Areas in order to preserve or enhance their special architectural or historic interest with an emphasis on retaining and where appropriate improving the	National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. ES Chapter 3: Alternatives (document reference 6.3) documents the key environmental factors that were considered in the

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	buildings and/or features that make a positive contribution to their character or appearance. The Council will conserve or enhance the significance (including any contribution made by its setting) of Listed Buildings, Scheduled Monuments and Registered Parks and Gardens with an emphasis on preserving and where appropriate enriching the social, cultural, economic and environmental benefits that these heritage assets provide. The Council will seek the protection, conservation, and where appropriate and important to their significance, re-use and/or enhancement of historic places and sites on the Heritage at Risk Register and the local buildings at risk register. When assessing applications for development, the Council will place great weight on the preservation or enhancement of designated heritage assets and their setting. The Council will encourage applicants to put heritage assets to viable and appropriate use, to secure their future preservation and where appropriate enhancement, as appropriate to their significance. Policy DM13 sets out how the Council will consider proposals affecting the different types of designated heritage assets and their significance. The Council will seek to conserve and where appropriate enhance the significance of non-designated heritage assets and their settings, which includes buildings, structures, features, gardens of local interest and protected lanes. Policy DM14 sets out the Council's approach to the protection and retention of these assets. Chelmsford contains a number of sites of archaeological importance. As set out in Policy DM15, the Council will seek the preservation and where appropriate	optioneering and design evolution process. The design considerations reflect National Grid's duty to be economical and efficient, as well as within the rigorous health and safety processes that National Grid has in place which govern how National Grid designs and constructs their projects safely. The Design Development Report (document reference 5.15), Design and Access Statement (document reference 7.15) and Design Approach for Site Specific infrastructure (document reference 7.16) summarise the different choices made during the design process. ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets (document reference 6.11.A7) found that the Project would not result in substantial harm to any heritage assets. Chapter 11: Historic Environment (document reference 6.11) concludes that within Chelmsford the project would result in adverse magnitude of impact to four designated assets including a registered park and garden, and three non-designated heritage assets. The substantial public benefits and need for the Project, as set out in Chapter 5 of the Planning Statement (document reference 5.6), including supporting the UK's net zero target, enabling the connection in East Anglia of new low carbon energy generation, and reinforcing the transmission network clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage assets of scheduled quality. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. This harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that

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	enhancement of sites and their setting of archaeological interest".	outweighs the heritage impact. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. The local planning authority have raised concerns that non-designated heritage assets have not been adequately considered in the assessment work to date. It is considered that the assessment methodology has been agreed, with the exception of non-designated heritage assets, where the method is still under discussion. See Draft Statement of Common Ground with Chelmsford (document reference 5.9.10). Within Chelmsford there are a number of Protected Lanes in proximity to the Project. The Project has sought to avoid works at Protected Lanes where practicable. However, during construction, works will be required at: • Cole Hill • Paulke Hall Road • Goodmans Lane • Lark's Lane The above routes would be oversailed by the Project and have temporary bellmouths installed or potentially existing accesses widened to allow access for construction vehicles. Other Protected Lanes may experience temporary increases in traffic flow. Impacts to Protected Lanes during the operational stage have been discounted from consideration, given that National Grid has committed to restoring any landscape feature requiring removal during construction. For instance, historic hedgerows will be restored, as will historic

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		earthworks contributing to the Protected Lane. There will also be no material increase in traffic using the Protected Lanes during the operational stage. Vegetation, earthworks (such as banks or ditches) and other boundary features (such as walls or fencing) that border protected lanes, as designated by Local Authorities, will be reinstated as close to their pre-construction condition as possible as set out in the commitments of the Outline CoCP (document reference 7.2). Pre-construction photographs will be taken to ensure a record is available to inform any reinstatement. ES Chapter 13: Landscape and Visual (document reference 6.13) and ES Appendix 13.2: Landscape Baseline and Assessment (document reference 6.13.A2), ES Appendix 13.3: Visual Baseline and Assessment (document reference 6.13.A3) and ES Appendix 13.4: Residential Visual Amenity Assessment (document reference 6.13.A4) provides an assessment of the landscape and visual impacts on Protected Lanes. Please see Policy DM15 for archaeological response.
Strategic Policy S4 – Conserving and Enhancing the Natural Environment	"The Council is committed to the conservation and enhancement of the natural environment through the protection of designated sites and species, whilst planning positively for biodiversity networks and minimising pollution. The Council will plan for a multifunctional network of green infrastructure which protects, enhances and, where possible, restores ecosystems, securing a net gain in biodiversity across the Council's area. The needs and potential of biodiversity will be considered together with those of natural, historic and farming landscapes, the promotion of health and wellbeing, sustainable travel, water management including water resources, and climate change adaptation.	The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, during the construction and operation (including maintenance) phases. In addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net

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	The Council will ensure that new development does not contribute to water pollution and, where possible, enhances water quality, and demonstrates the advancement of biodiversity and amenity interests through the provision of a range of greenspaces. The Council will take a precautionary approach where insufficient information is provided about avoidance, management, mitigation and compensation measures. Management, mitigation and compensation measures will be secured through planning conditions/obligations where necessary. The Council will ensure that, where appropriate, new development seeks to improve water-related biodiversity taking account of Water Framework Directive objectives and River Basin Management Plan actions. The Council will seek to minimise the loss of the best and most versatile agricultural land (Grades 1, 2 and 3a) to major new development. Where appropriate, contributions from developments will be secured towards mitigation measures identified in the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS) which will be completed by the time the Local Plan is adopted. Prior to RAMS completion, the authority will seek contributions, where appropriate, from proposed residential development to deliver all measures identified (including strategic measures) through project level HRAs, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitats Regulations and Habitats Directive".	gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1). There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required. In relation to water quality ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) details the likely significant effects of the Project on the water environment with respect to surface water discharges and water pollution. The baseline of the water environment is characterised in this chapter. The assessment has been informed by a WFD Assessment (document reference 7.10). The assessment presents the existing consented discharges to surface water have been obtained from the Environment Agency1 (January 2024). During construction, temporary watercourse crossings and associated activities may lead to changes in flow regimes, hydromorphology, and pollution risks, such as runoff and drilling fluid releases. Standard practice measures outlined in the Outline CoCP (document reference 7.2) mitigate these risks, reducing impacts on water quality and hydromorphology to negligible or minor adverse levels, which are not significant. For trenchless crossings, measures like drilling fluid breakout management plans minimise disturbance to sensitive watercourses, such as the River Stour. Overall, potential impacts on designated nature conservation sites and groundwater are assessed as

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		negligible and not significant, with safeguards ensuring minimal environmental disruption. Discussions would be held with the Environment Agency in relation to any required consents and permits necessary of the works, in accordance with commitment W01 in the Outline CoCP (document reference 7.2). The works would subsequently be carried out in accordance with the requirements of these consents, thereby safeguarding water environment receptors. Water pollution from permanent drainage will be avoided by timed inspections and maintenance by the Applicant, as required to safeguard surface and groundwater quality. Effects on watercourses, their water quality and hydromorphology, and effects on existing surface water interests (abstractions and discharges) are scoped out for operation (and maintenance) in accordance with the EIA Scoping Opinion (document reference 6.20). ES Chapter 6: Agriculture and Soils (document reference 6.6) assesses the potential residual effects of the Project on agricultural land use within the Order Limits. The potential presence of BMV land has been assessed through reference to published information and surveys of the areas permanently affected. The assessment sets out the total area of each land grade permanently affected and estimates the likely area of land at each grade. In Chelmsford, there are 29,280 hectares of BMV land, (85.5% of agricultural land in the Borough). During construction and operation (including maintenance) there would be a loss of BMV land (ALC Grades 1, 2 and 3a) from agricultural productivity. The Project minimises impacts on BMV agricultural land as far as practicable and includes mitigation measures to reduce impacts on the soil resource. The permanent loss of

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		BMV land is considered necessary on the basis that there is urgent need for CNP Infrastructure such as the Project. The routeing and siting selection process confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Project. No sterilising effects on land use are anticipated as a result of the Project. Unless otherwise identified for embedded or mitigation areas, landowners will still be able to farm beneath the overhead lines and above the underground cable. No likely significant effects on agricultural operations and viability are anticipated during operation.
Strategic Policy S9 – Infrastructure Requirements	"Flood Risk Management New development must be safe from all types of flooding and suitable strategic and site level measures will need to provide appropriate flood risk management. These include but are not limited to: • Strategic flood defence measures on the Rivers Can and Wid to protect existing development in Chelmsford City Centre • Local flood mitigation measures within or as part of development sites including the use of SuDS. Green Infrastructure and Natural Environment Infrastructure necessary to support new development must provide or contribute towards ensuring a range of green and natural infrastructure, net gain in biodiversity and public realm improvements. These include but are not limited to: • Provision of a wide range of open space within development sites to meet amenity, recreational and functional needs	From a transport and highways perspective, due to the nature of the Project and the requirement for a rural location links to sustainable means of transport are difficult to achieve. During construction efforts will be made to encourage the use of sustainable transport modes for construction workers. Appendix B Outline Construction Worker Travel Plan of the Outline CTMP (document reference 7.3) contains the Travel Plan, setting out the good practice measures that will be in place to encourage sustainable transportation for the workforce, in a way that reduces both environmental and social impacts on the local area. The objective of the Travel Plan is to encourage a reduction in the quantity of single-occupancy car journeys and to create a shift towards more sustainable modes of transport. In relation to flood risk, ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) sets out how the Project has sought to minimise impact on flooding. The majority of the Project lies within Flood Zone 1 and in zones that are at low risk of flooding from other sources. Due to its linear nature and the geographical extent of the Project, some components, namely pylons,

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	• To contribute towards a multifunctional network of green infrastructure and to enhance biodiversity • Provision of new public realm and enhancements at key centres of activity • Contributions towards recreation disturbance avoidance and mitigation measures for European designated sites as identified in the Essex Recreational disturbance Avoidance and Mitigation Strategy. Historic Environment Infrastructure necessary to support new development must seek to preserve or enhance the historic environment and mitigate any adverse impacts on nearby heritage assets and their settings".	must necessarily be located in areas with a medium and high risk of flooding (Flood Zones 2 and 3). The permanent Project works which lie within Flood Zone 3 are restricted to a small number of pylons for the overhead lines. These are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. The Outline CoCP (document reference 7.2) describes the good practice measures including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime. The FRA (document reference 7.9) states that access roads and haul roads, as well as areas where impermeable material will be installed in areas where heavy equipment would be used, will also have suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff. With regards to the natural environment The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats during the construction and operation (including maintenance) phases. In addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project would deliver an overall net

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		improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1). There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required. ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. ES chapter 11 concludes that the Project would not result in substantial harm to any heritage assets. Within Chelmsford the Project would result in less than substantial harm to a number of designated and non-designated heritage assets, and a scheduled monument. The substantial public benefits and need for the Project, as set out in Chapter 5 of the Planning Statement (document reference 5.6), including supporting the UK's net zero target, enabling the connection of new low carbon energy generation, and reinforcing the transmission network clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage assets of scheduled quality.

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Strategic Policy S11 – The Role Of The Countryside	"When determining planning applications, the Council will carefully balance the requirement for new development within the countryside to meet identified development needs in accordance with the Spatial Strategy, and to support thriving rural communities whilst ensuring that development does not have an adverse impact on the different roles and character of the countryside. All new development within the countryside will be considered within this context and against the specific planning objectives for each of the following areas: A) Green Belt The openness and permanence of the Green Belt will be protected and opportunities for its beneficial use will be supported where consistent with the purposes of the Green Belt. Inappropriate development will not be approved except in very special circumstances. B) Green Wedge The Green Wedge has an identified intrinsic character and beauty and is a multi-faceted distinctive landscape providing important open green networks, which have been instrumental in shaping the City's growth, character and appearance. These networks prevent urban sprawl and settlement coalescence and provide for wildlife, flood storage capacity, leisure and recreation, and travel by cycling and walking, which allows for good public access which will be further improved through the requirements of development allocated in the Local Plan. Development which materially harms the role, function and intrinsic character and beauty of the Green Wedge will not be approved.	The Project does cross the Metropolitan Green Belt through Chelmsford. The Planning Statement (document reference 5.6) presents an assessment of the Project against the relevant Green Belt policies. It concludes that the overhead lines comprise an engineering operation and should be regarded as not inappropriate in the Green Belt. Norwich to Tilbury is a vital part of the transition to net zero. Due to the growth in offshore wind generation, there has been a significant number of connections planned in the East Anglian and south-east coastal areas of England. As such, the network requires significant reinforcement to provide the connections of more offshore wind on the east coast. The Project demonstrates the most direct route to connect Norwich to Tilbury which crosses through the Green Belt. Furthermore, it is considered that an overhead line solution, rather than underground cables is the appropriate technology choice. The Project will not cross the Green Wedge as identified on the Chelmsford Local Plan policies map. The full assessment of the potential residual effects of the Project on landscape and visual amenity is contained in ES Chapter 13: Landscape and Visual (document reference 6.13) and ES Appendix 13.2: Landscape Baseline and Assessment (document reference 6.13.A2), ES Appendix 13.3: Visual Baseline and Assessment (document reference 6.13.A3) and ES Appendix 13.4: Residential Visual Amenity Assessment (document reference 6.13.A4).

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	C) Rural Area The countryside outside of the Urban Areas and Defined Settlements, not within the Green Belt, is designated as the Rural Area. The intrinsic character and beauty of the Rural Area outside of the Green Belt, and not designated as the Green Wedge, will be recognised, assessed and development will be permitted where it would not adversely impact on its identified character and beauty. The relevant Development Management Policies set out what development is appropriate in each of the above areas and provide detailed criteria by which development proposals will be assessed".	The landscape and visual amenity assessments indicate that the construction phases would result in significant negative landscape and visual amenity effects during construction. These significant effects are related to the introduction of construction activity and equipment, including the loss of some landscape features including farmland and field boundary vegetation. At Year 15 of operation, following the maturation of mitigation planting, the assessment concludes that significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure projects, as set out in Paragraphs 5.10.5 and 5.10.13 of NPS EN-1. The Project has been designed in accordance with the mitigation hierarchy and incorporates measures to mitigate harm to landscape and visual receptors, having regard to National Grid's statutory duty under Schedule 9 of the Electricity Act 1989 (in line with Paragraph 2.2.10 of NPS EN-5). However, some significant residual landscape and visual adverse effects will remain, as is inevitable with nationally significant energy infrastructure of the scale and type proposed. In the case of CNP infrastructure (such as the Project), "these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure.
Policy DM6 – New Buildings in the Green Belt	"Where new buildings are proposed within the Green Belt, inappropriate development will not be approved except in very special circumstances. A) New buildings Planning permission will be granted for the following exceptions to inappropriate development:	The Project is routed through the Metropolitan Green Belt between Chelmsford and the new Tilbury North Substation in Thurrock. An assessment on the Green Belt can be found in the Planning Statement (document reference 5.6). The assessment in the Planning Statement concludes that the overhead line infrastructure should be considered to be an engineering operation and as such should not be regarded as inappropriate development in the Green Belt.

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	i. buildings for agricultural and forestry; ii. provision of appropriate facilities for outdoor sport, outdoor recreation and cemeteries as long as it preserves the openness of the Green Belt; iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location and would preserve the openness of the Green Belt and not conflict with its purposes; iv. infilling in accordance with Policy DM9; v. limited affordable housing for local needs in accordance with Policy DM2; vi. extensions or alterations to buildings in accordance with Policy DM11; vii. redevelopment of previously developed land in accordance with Part B of this Policy; viii. replacement buildings in accordance with Part C of this Policy... Planning permission will be granted where the proposed development would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing use and/or development. The Council will assess the development based on the following: i. the size, scale, massing and spread of the new development compared to the existing; and ii. the visual impact of the development compared to the existing; and	In the interest that the Project may not fall within the aforementioned exemptions, it could nonetheless be considered to satisfy the criteria for very special circumstances. Paragraph 154 of the National Planning Policy Framework (NPPF) specifies that development in the Green Belt is generally considered inappropriate unless it satisfies defined exemptions. Paragraph 154(h)(ii) clarifies that engineering operations may be deemed appropriate, provided they preserve the openness of the Green Belt and do not conflict with its intended purposes. National Grid asserts that the overhead lines qualify as an "engineering operation" and should not be deemed inappropriate in the Green Belt, provided they preserve its openness and adhere to its designated purposes. This stance is further supported by Paragraph 5.11.22 of the National Policy Statement (NPS) EN-1, which discusses suitability of underground lines. Paragraph 4.2.16 of NPS EN-1 stipulates that for projects classified as Critical National Priority (CNP) Infrastructure, the Secretary of State will commence the decision-making process with the presumption that such infrastructure satisfies any tests outlined in the National Policy Statements (NPSs) or other relevant planning policies, including those requiring a clear demonstration of harm being outweighed, exceptionality, or very special circumstances. Paragraph 4.2.17 reinforces this presumption, including where development is proposed within the Green Belt and requires very special circumstances for approval. Paragraph 3.3.62 of NPS EN-1 confirms the Government's recognition of a CNP for delivering nationally significant low-carbon infrastructure. CNP infrastructure is defined as nationally significant low-carbon infrastructure, encompassing electricity grid projects such as power lines within the scope of NPS EN-5, network

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	iii. the activities/use of the new development compared to the existing; and iv. the location of the site is sustainable and appropriate to the type of development proposed..."	reinforcement and upgrade works, and associated infrastructure, including substations. Therefore, while the needs case for the development justifies its very special circumstances, the current policy position outlined in NPS EN-1 and EN-5 affirms that the proposed power lines meet CNP infrastructure, satisfying the test for requiring very special circumstances to justify development.
Policy DM8 – New Buildings and Structures in the Rural Area	"A) New buildings and structures Planning permission will be granted for new buildings and structures in the Rural Area where the development will not adversely impact on the identified intrinsic character and beauty of the countryside and where the development is for… i. local transport infrastructure and other essential infrastructure or development which supports existing or potential utility infrastructure; or … B) Redevelopment of previously developed land (whether redundant or in continuing use and excluding temporary buildings) Planning permission will be granted where the proposed development would not result in harm to the identified intrinsic character, appearance and beauty of the area. The Council will assess the development based on the following: i. the size, scale, massing and spread of the new development compared to the existing; and ii. the visual impact of the development compared to the existing; and	In accordance with criteria (A) the Project is an infrastructure project and is therefore a type of development considered acceptable in the rural area. With regards to criteria (B) within Chelmsford, National Grid has adopted overhead line as the preferred technology choice. The full assessment of the potential residual effects of the Project on landscape and visual amenity is contained in ES Chapter 13: Landscape and Visual (document reference 6.13) and ES Appendix 13.2: Landscape Baseline and Assessment (document reference 6.13.A2), ES Appendix 13.3: Visual Baseline and Assessment (document reference 6.13.A3) and ES Appendix 13.4: Residential Visual Amenity Assessment (document reference 6.13.A4). The landscape and visual amenity assessments indicate that the construction phases would result in significant negative landscape and visual amenity effects during construction. These significant effects are related to the introduction of construction activity and equipment, including the loss of some landscape features including farmland and field boundary vegetation. At Year 15 of operation, following the maturation of mitigation planting, the assessment concludes that significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually

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	iii. the impact of the activities/use of the new development compared to the existing; and iv. the location of the site is appropriate to the type of development proposed".	all nationally significant energy infrastructure projects, as set out in Paragraphs 5.10.5 and 5.10.13 of NPS EN-1. The Project has been designed carefully and incorporates measures to mitigate harm to landscape and visual receptors, having regard to National Grid's statutory duty under Schedule 9 of the Electricity Act 1989 (in line with Paragraph 2.2.10 of NPS EN-5). However, some significant residual landscape and visual adverse effects will remain, as is inevitable with nationally significant energy infrastructure of the scale and type proposed. In the case of CNP infrastructure (such as the Project), "these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure.
Policy DM13 – Designated Heritage Assets	A) The impact of any development proposal on the significance of a designated heritage asset or its setting, and the level of any harm, will be considered against any public benefits arising from the proposed development. Where there is substantial harm or total loss of significance of the designated heritage asset, consent will be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss; or all of the following apply: i. the nature of the heritage asset prevents all reasonable uses of the site; and ii. use of the asset is not viable in itself in the medium term, or not demonstrably possible in terms of grant funding; and iii. the harm or loss is outweighed by bringing the site back into use.	ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets (document reference 6.11.A7) found that the Project would not result in substantial harm to any heritage assets. Chapter 11: Historic Environment (document reference 6.11) concludes that within Chelmsford City Council the project would result in a permanent adverse magnitude of impact to four designated

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	Where there is less than substantial harm to the heritage asset this will be weighed against the public benefits of the development proposal, including securing the optimum viable use of the heritage asset. The Council will take account of the desirability of sustaining and enhancing the significance of heritage assets and the positive contribution that conservation of heritage assets can make to sustainable communities, local character and distinctiveness. B) Listed Buildings In addition to Part A) the Council will preserve Listed Buildings and will permit proposals where: i. any extension/alteration would not adversely affect its significance as a building of special architectural or historic interest, both internally and externally; and ii. development within the setting of a listed building would not adversely affect the significance of the listed building, including views to and from the building, landscape or townscape character, land use and historic associations; and iii. any change of use would preserve its significance as a building of special architectural or historic interest and ensure its continued use. C) Conservation Areas In addition to Part A) development will be permitted in Conservation Areas where: i. the siting, design and scale would preserve or enhance the character or appearance of the area; and	heritage assets. This impact is considered to be less than substantial. The Project will impact one scheduled monument, and two conservation areas due to changes in their setting that affect their significance however the magnitude of change is predicted to be negligible/low and not of a substantial nature. The substantial public benefits and need for the Project, as set out in Chapter 5 of the Planning Statement (document reference 5.6), including supporting the UK's net zero target, enabling the connection in East Anglia of new low carbon energy generation, and reinforcing the transmission network clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage assets of scheduled quality. With regard to non-designated heritage assets ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets (document reference 6.11.A7) and Chapter 11: Historic Environment (document reference 6.11) conclude that within Chelmsford Council (Section F) the project would result in permanent adverse magnitude of impact to 3 non-designated heritage assets due to a change in setting but this impact would be at the lower end of the spectrum of less than substantial harm. As noted in the paragraphs above the level of harm is justified by the substantial public benefits and need for the Project, as set out in Chapter 5 of the Planning Statement (document reference 5.6). In relation to archaeology, within Chelmsford City Council (Section F of the route), ES Chapter 10: Historic Environment (document reference 6.10) has identified two priority geophysical surveys have been undertaken which have revealed possible archaeology linear anomalies. Full

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	ii. building materials and finishes are appropriate to the local context; and iii. features which contribute to the character of the area are retained; and iv. important views are preserved… D) Registered Parks and Gardens Development proposals should protect Registered Parks and Gardens and their settings. Harm should be assessed in accordance with the tests within Part A) of this policy. E) Scheduled Monuments Development proposals should protect Scheduled Monuments and their settings. Harm should be assessed in accordance with the tests within Part A) of this policy".	details are provided in ES Appendix 11.4: Geophysical Survey Results Report (document reference 6.11.A4). One priority archaeological trial trench survey is proposed around pylon TB132. This will be reported in ES Appendix 11.5: Trial Trenching Results Report (document reference 6.11.A5). Mitigation measures to reduce impacts on archaeology are set out in the Archaeological Mitigation Strategy and Outline WSI (document reference 7.5) and includes preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction.
Policy DM14 – Non-Designated Heritage Assets	"Proposals will be permitted where they retain the significance of a non-designated heritage asset, including its setting. Where proposals would lead to harm to the significance of a non-designated heritage asset or its loss, proposals should demonstrate that: i. the level of harm or loss is justified following a balanced judgement of harm and the significance of the asset; and ii. harm is minimised through retention of features of significance and/or good design and/or mitigation measures".	
Policy DM15 – Archaeology	"Planning permission will be granted for development affecting archaeological sites providing it protects, enhances or preserves sites of archaeological interest and their settings. Applications shall have assessed the	

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	site in consultation with the Historic Environment Record and taken account of the archaeological importance of those remains, the need for the development, the likely extent of any harm, and the likelihood of the proposal successfully preserving the archaeological interest of the site by record".	
Policy DM16 – Ecology and Biodiversity	A) "Internationally Designated Sites Developments that are likely to have an adverse impact (either individually or in combination with other developments) on European Designated Sites must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoiding or mitigating against impacts where identified. Where appropriate, contributions from developments will be secured towards mitigation measures identified in the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS) which will be completed by the time the Local Plan is adopted. Prior to RAMS completion, the authority will seek contributions, where appropriate, from proposed residential development to deliver all measures identified (including strategic measures) through project level HRAs, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitats Regulations and Habitats Directive. B) Nationally Designated Sites Development proposals within or outside a SSSI, likely to have an adverse effect on a SSSI (either individually or in combination with other developments), will not be permitted unless, on an exceptional basis, the benefits of the development clearly outweigh both the adverse	The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) presents the assessment of the likely significant ecology and biodiversity effects that could result from the Project. The chapter concludes there will be some temporary impact associated with the construction phase to both statutory designated sites and non-statutory designed sites. These temporary impacts will be mitigated through the standard mitigation measures set out in the Outline CoCP (document reference 7.2) which will remove potential significant effects associated with dust, noise and hydrological effects on most statutory designated sites within the Study Area. Where the construction phase results in temporary habitat damage or loss the habitat will be reinstated post-construction ensuring there would be no long-term adverse impact. Some of the woodland habitats cannot be replaced due to safety clearances and therefore, mitigation in the form of compensation planting is proposed. The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats during the

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	impacts on the features of the site and any adverse impacts on the wider network of SSSIs. C) Locally Designated Sites Development likely to adversely affect locally designated sites, their features or their function as part of the ecological network, will only be permitted where the need and benefits of the development clearly outweigh the loss and the coherence of the local ecological network is maintained. D) Biodiversity and Geodiversity in Development All development proposals should: i. Conserve and enhance the network of habitats, species and sites (both statutory and non-statutory, including priority habitats and species) of international, national and local importance commensurate with their status and give appropriate weight to their importance; and ii. Avoid negative impacts on biodiversity and geodiversity, mitigate unavoidable impacts and as a last resort compensate for residual impacts; and iii. Deliver a net gain in biodiversity where possible, by creating, restoring and enhancing habitats, and enhancing them for the benefit of species".	construction and operation (including maintenance) phases. In relation to point D (iii) in addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1). There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required.
Policy DM17 – Trees, Woodland and Landscape Features	A) "Protected Trees and Woodland Planning permission will be granted for development proposals that do not result in unacceptable harm to the health of a preserved tree, trees in a Conservation Area or Registered Park and Garden, preserved woodlands or ancient woodlands. Consideration will also be given to	The Project has been designed in a way which prioritises the retention of vegetation wherever practicable in accordance with good practice measures as outlined within the Outline CoCP (document reference 7.2). Owing to the size of the Project it has not been possible to completely avoid the loss of such natural features. The Outline LEMP (document reference 7.4) sets out the principal measures

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	the impact of a development on aged or veteran trees found outside ancient woodlands. Development proposals that have the potential to affect preserved trees, trees in a Conservation Area or Registered Park and Garden, preserved woodlands or ancient woodlands must set out measures to secure their protection. In exceptional circumstances there may be overriding public benefits arising from the development that could justify the removal of a preserved tree or trees. In such circumstances, a replacement tree, or trees, shall be provided of a size and type suitable for its location. B) Other Landscape Features Planning permission will be granted for development proposals that do not result in unacceptable harm to natural landscape features that are important to the character and appearance of the area. Harm or loss of these features will not be permitted unless a landscape strategy, which would compensate for the loss or harm, is secured or where there are overriding public benefits arising from the development".	that are required to help avoid, minimise, mitigate and compensate (where relevant) the impacts to vegetation. The Project will not impact on any trees in a conservation area or Registered Park and Garden. In relation to Ancient Woodlands, the physical extent of each ancient woodland along the Project has been mapped based on a combination of aerial imagery and based on information obtained from the ground truthing woodland surveys. Table 8.23 in ES Chapter 8: Ecology and Biodiversity (document reference 6.7) lists the Ancient Woodlands identified within a 200m of the Project's Order Limits and identifies the proposed mitigation measure/commitment. The location and further information relating to all Ancient Woodlands is presented within Appendix 8.1: Habitats Report and presented on Figure A8.1.3: Ancient Woodland Locations (document reference 6.8.A1). In addition, the Project has considered 11 woodlands to be Ancient Woodland within ES Chapter 8: Ecology and Biodiversity (document reference 6.8) due to the Local Wildlife Site citations mentioning these woodlands support ancient woodland features. These woodlands have therefore been included in the impact assessment as Ancient Woodland. Potential impacts (excavation and non-excavation), in the absence of mitigation, were identified at 10 ancient woodland parcels. As a result of these Project commitments impacts associated with five ancient woodlands have been completely. The remaining 5 ancient woodlands (and the associated 15 m buffer) is unavoidable as all proposed works relate to the removal, undergrounding or modification of existing third-party infrastructure (11 kV, 33 kV, 132 kV), with the existing assets already located within the associated woodland or

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		root protection zone. Out of the remaining ancient woodlands 1 woodland Writtle-Writtlepark Wood is located within Chelmsford City Council (Section F of the Project route). The north-east corner of Bosmore Wood (part of the Writtlepark Wood complex) is partially within the Order Limits due to the removal and undergrounding of the 11 kV UKPN overhead line 4 m into the woodland. Undergrounding works would use delicate and precise techniques such as hand-digging or vacuum excavation to protect root structures. Bosmore Wood is also 14 m west, at the closest point, from a permanent access route (right of access only – no physical works) for construction of pylon TB180. A comprehensive explanation of the Project approach to ancient woodland avoidance and minimisation of impact on ancient woodland is detailed in Appendix B: Ancient Woodland and Veteran Tree Strategy (document reference 7.4.B) With regard to veteran trees, a desk study was undertaken to determine the location of veteran trees recorded within 30 m of the Order Limits. An arboricultural survey was also undertaken between May 2023 and May 2025. Figure 7.4.A13 shows the location of veteran trees. A full record of the identified veteran trees is included in Table 7.3 of the Outline LEMP (document 7.4). Annex D lists the veteran trees within the Study Area and identifies the assumed mitigation. The Ancient Woodland and Veteran Tree Strategy Report states that based on the existing overhead line alignments without considering the LoD this is an initial assessment of veteran tree removals and impacts and all attempts should be made during detailed design to retain veteran trees where practicable (see commitment B18 in the CoCP (document reference 7.2). Ancient Woodland and Veteran Tree Strategy Report details the management outcomes for veteran trees. The final mitigation measures,

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		remediation works and long-term monitoring are to be agreed at detailed design stage with the Project arboriculturist and the relevant landowners on a case-by-case basis. All management options discussed for veteran trees need to be achievable and therefore will need landowner consent and agreement with National Grid. Protection measures are to be in place prior to the commencement of construction or pre-construction works and require sign off by the Project Arboriculturist. Within Chelmsford City (and Brentwood Borough), the Arboricultural Impact Assessment notes that a number of high and moderate quality features will be affected. A total of 49 individual trees will be removed; 27 groups of trees will be partly removed; 13 individual trees and 4 groups will be affected / managed; 60 individual trees and 7 groups will be retained with protection measures. Unavoidable tree loss will be compensated through the implementation of landscape design including new tree planting (refer to ES Chapter 13: Landscape and Visual (document reference 6.13) and the Outline Landscape and Ecological Management Plan (document reference 7.4). The Outline LEMP notes that compensatory tree planting will be provided at a 3:1 ration using local provenance stock of native species with awareness to pests and diseases, with species and numbers. Where possible vegetation lost during construction will be replanted in the same location as previously apart from where permanent infrastructure doesn't prohibit this.
Policy DM18 – Flooding/SUDS	A) "Planning permission for all types of development will only be granted where: i. it can be demonstrated that the site is safe from all types of flooding, either because of existing site	The FRA (document reference 7.9) has been submitted as part of the application for development consent focussing on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. A sequential approach has been taken in siting the Project. The parts of the

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	conditions or through flood risk management from the development, now and for the lifetime of the development; and ii. it does not worsen flood risk elsewhere. B) In addition to above Part A) development within areas of flood risk will be required to: i. provide a safe means of escape or suitably manage risk through some other means; and ii. manage surface water run-off so that the run-off rate is no greater than the run-off prior to development taking place or, if the site is previously developed, development reduces run-off rates and volumes as far as is reasonably practical; and iii. locate the most vulnerable development in areas of lowest flood risk unless there are overriding reasons for not doing so. C) All major development will be required to incorporate water management measures to reduce surface water run-off and ensure that it does not increase flood risk elsewhere. The principal method to do so should be the use of Sustainable Drainage Systems (SuDS). As well as providing appropriate water management measures, where possible SuDS should be multi-functional to deliver benefits for the built, natural and historic environment. Surface water connections to the public sewerage network should only be made where it can be demonstrated that there are no feasible alternatives (this applies to new developments and redevelopments) and where there is no detriment to existing users".	Project located in the Chelmsford City Council area (Section F of the Project route) are mostly located in Flood Zone 1. As addressed in the FRA (document reference 7.9) there are two pylons proposed in the floodplain in Section F that would need compensatory storage. The Risk of Flooding from Surface Water map in ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) shows that most of the land within Section F is at very low risk of surface water flooding. As shown in the FRA (document reference 7.9), where there are interactions between the Project and the high-risk zone during construction, these are mostly where temporary haul roads and pylon construction working areas are proposed. However, there are small parts of the temporary construction compound off Braintree Road, near TB134, Chelmsford (TB-Main) is shown to be at high risk of surface water flooding. The requirements for compensation of loss of floodplain storage associated with these pylons is addressed in the following sub-section and secured by commitment W17 in the Outline CoCP (document reference 7.2). Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures. These measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk. During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the FRA. Above ground structures such as pylons and below ground structures such as the

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		underground cable are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. The Outline CoCP (document reference 7.2) describes the good practice measures including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime. The FRA (document reference 7.9) states that access roads and haul roads, as well as areas where impermeable material will be installed in areas where heavy equipment would be used, will also have suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff.
Policy DM23 – High Quality and Inclusive Design	"A) Responding to Context Planning permission will be granted for development that respects the character and appearance of the area in which it is located. Development must be compatible with its surroundings having regard to scale, siting, form, architecture, materials, boundary treatments and landscape…".	The Design and Access Statement (document reference 7.15) and Design Appraisal of Site Specific Infrastructure (document reference 7.16) set out a summary of National Grid's approach to good design and demonstrate how National Grid has responded to the physical, environmental and socio-economic context of the Project. The Design Development Report (document reference 5.15), ES Chapter 3 Alternatives (document reference 6.3), Design and Access Statement (document reference 7.15) and Design Approach to Site Specific Infrastructure (document reference 7.16) provide an overview of the design rationale for the Project. They outline how the design choices have sought to reduce the environmental effects of the Project and demonstrate that the design has incorporated mitigation measures in order to avoid or reduce significant environmental effects wherever practicable.

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		The Design Development Report (document reference 5.15) also explains the changes that were made to the Project as a result of feedback from the 2024 consultation process. The process of reviewing and responding to consultation feedback is explained in the Consultation Report (document reference 5.1). In line with national policy requirements, the Project has been designed following the mitigation hierarchy and has avoided impacts where possible through the routeing and siting process. Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features as far as reasonably practicable. National Grid has embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project.
Policy DM24 – Design and Place Shaping Principles in Major Developments	"The Council will require all new major development to be of high quality built form and urban design. All new major development should reflect the following principles: • Respect the historic and natural environment of biodiversity and amenity interests through the provision of a range of green spaces • Respond positively to local character and context to preserve and enhance the quality of existing communities • Include parking facilities that are well integrated as part of the overall design	In line with national policy requirements, the Project has been designed following the mitigation hierarchy and has avoided impacts where possible through the routeing and siting process. Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features as far as reasonably practicable. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) presents the assessment of likely significant ecology and biodiversity impacts. It concludes that the Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological

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	• Retain existing trees and other landscape features where appropriate and explore opportunities for new tree planting…".	features such as protected species and habitats during both the construction and operation (including maintenance). ES Chapter 11 Historic Environment (document reference 6.11) assesses the likely significant cultural heritage effects that could result from the Project. The ES Chapter concludes that the Project would not result in substantial harm to any heritage assets. Within Section F the Project would result in less than substantial harm to four listed buildings, one registered park and garden, one scheduled monument and two conservation areas. The substantial public benefits and need for the Project, as set out in Chapter 5 of the Planning Statement (document reference 5.6), including supporting the UK's net zero target, enabling the connection in East Anglia of new low carbon energy generation, and reinforcing the transmission network clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and non-designated heritage assets of scheduled quality. The Project's impact on local character and context has been given consideration. See response to Policy DM23 – High Quality and Inclusive Design above for more details on how the Project has been sensitively routed to avoid where possible significant residual impacts on the landscape. In addition to the above ES Chapter 13: Landscape and Visual (document reference 6.13) explains how at year 1 of operation, there would be significant landscape effects which would be directly affected by the introduction of an overhead line, and CSE compound. Significant effects would also extend to the surrounding landscape, up to a distance of approximately 1.5 km. There would also be significant landscape effects along the route of the sections of underground cable, where reinstated vegetation would still be immature. By year 15 the Project the effects to the countryside caused by the construction

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		impacts would reduce due to maturing of the reinstatement planting which would integrate the areas previously used for construction, into the landscape (noting that trees would not be replanted over the cable route). Significant effects relating to the proposed overhead line would remain. ES Chapter 16: Traffic and Transport (document reference 6.16) explains that parking provision will be provided during the construction phase, noting that the operational phase impacts have been scoped out of the assessment. The Project has sought to avoid or mitigate the loss of trees and other landscape features. See response to Policy DM17 –Trees, Woodland and Landscape Features in this table for more details.
Policy DM25 – Design and Place Shaping Principles in Major Developments	"The Council will expect all new dwellings and non-residential buildings to incorporate sustainable design features to reduce carbon dioxide and nitrogen dioxide emissions, and the use of natural resources, as follows where relevant… Non-residential development should provide charging points equivalent to 10% of the total parking provision Public charging points should be located in highly visible, accessible locations close to building entrances...".	National Grid has undertaken a GHG assessment in ES Appendix 4.1: Greenhouse Gas Assessment (document reference 6.4.A1). This calculates the CO2 equivalent (CO2e) comprising both CO2 and SF6 for the Project for the construction and operational (and maintenance) phases and compared them against relevant carbon budgets and emissions. The assessment concludes that the construction and operational CO2e numbers are not considered to have a material impact on the ability of the Government to meet its carbon reduction targets and therefore are not significant. SF6 is a gas commonly used in the electricity industry in electrical switchgear to insulate the live electrical parts and to safely switch the flow of electrical current on and off. This switchgear is used throughout the electrical network, including to connect the generation and storage of renewable energy of all types. As outlined in the Greenhouse Gas Assessment (document reference 6.4.A1) It is assumed that no SF6 equipment will be used in the Project, in accordance with National Grid

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		policy. SF6 alternatives such as C4 or G3 have a 99% lower global warming potential (GWP) than SF6. Measures to reduce greenhouse gas emissions are set out in Appendix H of the CoCP: Greenhouse Gas Reduction Strategy (document reference 7.2.H). The GHG Assessment has considered all GHG emissions from within the Order Limits arising during all stages of the construction, operation and decommissioning, as well as emissions from off-site activities. Th GHG Assessment identifies the carbon dioxide equivalent emissions that would be released during the construction and operation of the Project. The assessment concludes that the construction and operational CO2e numbers are not considered to have a material impact on the ability of the Government to meet its carbon reduction targets and therefore are not significant. Therefore, the operational, medium to long term benefits of delivering the Project on a national level are considered to outweigh any short-term impacts of greenhouse gas (GHG) emissions because of material use and construction activities.
Policy DM29 – Protecting Living and Working Environments	"Planning permission will be granted for development proposals provided the development: i. safeguards the living environment of the occupiers of any nearby residential property by ensuring that the development is not overbearing and does not result in unacceptable overlooking or overshadowing. The development shall also not result in excessive noise, activity or vehicle movements; and ii. is compatible with neighbouring or existing uses in the vicinity of the development by ensuring that the development avoids unacceptable levels of polluting emissions by reason of noise, light, smell, fumes,	In relation to point (i) on overlooking or overshadowing, and impacts to residential amenity as a result of the Project are considered in ES Appendix 13.4: Residential Visual Amenity Assessment (document reference 6.13.A4). The assessment concluded that most residential properties within the Study Area of 200 m would not be detrimentally affected by the Project. In some instances, however a high visual change of a high magnitude would be experienced therefore mitigation measures have been recommended to reduce effects on these properties. With reference to point (i) on vehicle movements the Transport Assessment (document reference 7.11) assesses the potential for disruption to infrastructure during

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	vibrations or other issues, unless appropriate mitigation measures can be put in place and permanently maintained...".	construction. The Project is expected to generate very low level vehicle movements during operational and maintenance phase therefore operational effects to the transport network have been scoped out of the assessment. The conclusions presented in ES Chapter 16: Traffic and Transport (document reference 6.16) demonstrate that with mitigation measures, the assessment of traffic generated during construction and operation (including maintenance) of the Project will not result in significant adverse effects on road users, equestrians, walkers, cyclists and horse riders and road links in terms of delay, severance, amenity, fear and intimidation, accidents and road safety, and parking and loading. With regard to point (ii) on noise ES Chapter 14: Noise and Vibration (document reference 6.14) presents the assessment of the likely significant noise and vibration effects that could result from the construction of the Project. The Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects in accordance with Paragraph 4.1.5 of NPS EN-1. The assessment concluded with the relevant standard mitigation measures and best practicable means (BPM) set out in Appendix F: Outline Noise and Vibration Management Plan to the Outline CoCP (document reference 7.2) relating to noise and vibration the residual effect of construction noise will not be significant to all nearby NSRs during both daytime and nighttime periods. Further detailed construction noise and vibration assessments will be undertaken by the main works contractor(s) prior to commencing works. Operational noise from overhead lines is scoped out of the ES, in accordance with the Scoping Opinion (document reference 6.20), on the basis that a low noise conductor system is proposed. However, additional information

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		regarding operational noise impacts from, Tilbury North Substation and overhead lines is provided for information in ES Appendix 14.4: Tilbury North Substation Operational Noise Assessment (document reference 6.14.A4) and ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) (document reference 6.14.A5) respectively. With reference to point (ii) on smells, fumes and emissions, as identified in the Statement of Statutory Nuisance (document reference 5.4) it is not anticipated that construction activities would give rise to any material amounts of steam, smell or other effluvia. In relation to point (ii) light pollution, ES Chapter 13: Landscape and Visual (document reference 6.13) presents the assessment of likely significant landscape and visual effects that could result from the Project including lighting impacts. The assessment has been based on the assumptions that: All works associated with substation - exterior and interior lighting would be provided at the site to allow for safe movement and the operation of equipment. All lighting would be designed in accordance with the appropriate design standards and be motion-sensor activated. A typical construction day will consist of 12-hours meaning in winter this would require working in the dark at either end of the day. For the purposes of the ES, it is therefore assumed that winter working will require lighting at certain sites but will not be wide scale across the Project. The Outline CoCP (document reference 7.2) sets out the good practice measures to protect Landscape and Visual environments during construction and operation. Key measures include directional and minimised construction lighting (LV03), locating potentially disruptive activities and equipment away from sensitive receptors like residential

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		areas where practicable (GG22), designing permanent lighting to minimise impacts on adjacent properties (GG31), and ensuring construction lighting is switched off when not in use and positioned to avoid spillover onto nearby land (B06).
Policy DM30 – Contamination and Pollution	"A) Hazardous Substance Sites or Land For developments on, or near to, hazardous substance sites or land which is contaminated or has a history of a potentially contaminating use, permission will only be granted where the Council is satisfied that: i. there will be no threat to the health or safety of future users or occupiers of the site or neighbouring land; and ii. there will be no adverse impact on the quality of local groundwater or surface water. B) Air Quality Management Area For developments in or adjacent to an Air Quality Management Area, or where an air quality impact assessment has been provided, permission will only be granted where the Council is satisfied that after selection of appropriate mitigation the development will not have an unacceptable impact on air quality and the health and wellbeing of people".	ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9) considers land contamination and is supported by a Preliminary Contamination Risk Assessment (PRA) (ES Appendix 9.1: Baseline Information and Preliminary Contamination Risk Assessment (document reference 6.9.A1)). The PRA has identified a generally 'very low/low risk' of significant existing contamination to be present within most of the Order Limits. There are no sites in Chelmsford City Council area assessed as presenting a potential Moderate or above risk to sensitive receptors from existing contamination. Standard mitigation measures within the Outline CoCP (document reference 7.2) will be adopted during construction to deal with unexpected land contamination. The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. ES Chapter 7: Air Quality (document reference 6.7) assesses the likely air quality effects that would result from the Project and considers the existing baseline conditions and the likely changes and effects to air quality levels during the construction phase. As set out in the Scoping Report (document reference 6.19) and agreed within the Scoping Opinion (document reference 6.20), the operational phase of the Project will not result in any significant impacts to air quality and no further assessment has been carried out in

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		the ES. AQMAs and council Air Quality Action Plans have been taken into consideration as a part of this assessment. The assessment confirms that with the implementation of the proposed standard mitigation measures, the effects of construction on air quality in regard to dust soiling, and human health effects are anticipated to be not significant. ES Chapter 10: Health and Wellbeing (document reference 6.10) details the assessment of the potential residual effects of the Project on Health and Wellbeing. The assessment includes a series of embedded and standard mitigation measures considered as part of the integral environmental appraisal considered from the outset. Section 10.7 of ES Chapter 10 demonstrates that the likely significant effects of the Project can be mitigated through the proposed measures, such to comply with National, Regional and Local Policy. These measures have been informed through the engagement and consultation activities that have taken place with stakeholders, which has helped to provide for a well-informed approach that takes into account local demographics and health considerations.
Basildon Local Plan Saved Policies (2007)		
Policy BAS C1 – Protected Areas – SSSI's, SNIC's & important wildlife habitats	"The Council will not permit development which may have an adverse material effect on a Site of Special Scientific Interest (SSSI). When considering planning applications affecting Sites of Importance for Nature Conservation (SINC) or other important wildlife habitats, the Council will have full regard to the nature conservation value of the site.	The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) presents the assessment of the likely significant ecology and biodiversity effects that could result from the Project. The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and

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	The criteria which the Council will take into account in dealing with planning applications affecting SSSIs, SINCs and other important habitats will be: i. effects on significant nature conservation or scientific features of the site; ii. the importance of the site and of any nature conservation or scientific features affected; and iii. any benefits of the proposed development".	locally designated biodiversity sites and other important ecological features such as protected species and habitats during the construction and operation (including maintenance) phases.
Policy BAS C5 – Trees and Woodlands – Protection of Ancient Woodlands	"Existing woodlands should be retained, especially where they are Ancient Woodlands".	National Grid has undertaken an Arboricultural Impact Assessment (ES Appendix 13.6, document reference 6.13.A6) in accordance with British Standard 5837:2012 Trees in Relation to Design, Demolition and Construction. This has identified trees that offer significant amenity value, such as ancient woodland, which the Project has sought to avoid, where practicable. Owing to the size of the Project it has not been possible to completely avoid the loss of such natural features, therefore an Ancient Woodland and Veteran Tree Strategy Report (Appendix E to the Outline LEMP (document reference 7.4)) has been prepared to support the application for development consent. In relation to Ancient Woodlands, the physical extent of each ancient woodland along the Project has been mapped based on a combination of aerial imagery and based on information obtained from the ground truthing woodland surveys. Table 8.23 in ES Chapter 8: Ecology and Biodiversity (document reference 6.7) lists the Ancient Woodlands identified within a 200m of the Project's Order Limits and identifies the proposed mitigation measure/commitment. The location and further information relating to all Ancient Woodlands is presented within Appendix 8.1: Habitats Report and presented on Figure

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		A8.1.3: Ancient Woodland Locations (document reference 6.8.A1). In addition, the Project has considered 11 woodlands to be Ancient Woodland within ES Chapter 8: Ecology and Biodiversity (document reference 6.8) due to the Local Wildlife Site citations mentioning these woodlands support ancient woodland features. These woodlands have therefore been included in the impact assessment as Ancient Woodland. Potential impacts (excavation and non-excavation), in the absence of mitigation, were identified at 10 ancient woodland parcels. As a result of these Project commitments impacts associated with five ancient woodlands have been completely. The remaining 5 ancient woodlands (and the associated 15 m buffer) is unavoidable as all proposed works relate to the removal, undergrounding or modification of existing third-party infrastructure (11 kV, 33 kV, 132 kV), with the existing assets already located within the associated woodland or root protection zone. Out of the remaining ancient woodlands none are located within Basildon Council (part of Section G of the Project route) therefore there will be no impacts to ancient woodlands in the district. A comprehensive explanation of the Project approach to ancient woodland avoidance and minimisation of impact on ancient woodland is detailed in Appendix B: Ancient Woodland and Veteran Tree Strategy (document reference 7.4.B). Unavoidable tree loss would be compensated through the implementation of landscape design including new tree planting (refer to ES Chapter 13: Landscape and Visual (document reference 6.13) and the Outline Landscape and Ecological Management Plan (document reference 7.4).

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		New tree planting will use local provenance stock of native species with awareness to pests and diseases, with species and numbers outlined in the Outline LEMP, which is secured by DCO requirement.
Policy BAS C13 – Water Wildlife	"The Council will not normally permit development which may adversely and materially affect any river, pond, lake or other important water feature or wildlife habitat of acknowledged importance".	In relation to water quality ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) details the likely significant effects of the Project on the water environment with respect to surface water discharges and water pollution. The baseline of the water environment is characterised in this chapter. The assessment has been informed by a WFD Assessment (document reference 7.10). Effects on watercourses, their water quality and hydromorphology, and effects on existing surface water interests (abstractions and discharges) are scoped out for operation (and maintenance) in accordance with the EIA Scoping Opinion (document reference 6.20).
Policy BAS C15 – Hazardous Substances	"The Council will not permit hazardous development which would cause material harm to the health and safety of the District's population. The Council will have particular regard to the following factors:- i. the nature and scale of the hazardous development proposed; ii. the distance, and the existence of any existing or potential effective screening, between the hazardous development proposed and any existing or permitted residential, employment or other development where people could be expected to congregate; iii. the nature of development in the vicinity of the proposed hazardous development; and iv. movement of hazardous substances in association with the proposed hazardous development".	The Outline CoCP (document reference 7.2) sets out measures to minimise the risk of a pollution incident occurring including appropriate storage and handling of fuels and other substances hazardous to the environment. The contractor would ensure that any potentially hazardous waste is correctly stored, tested, recorded and disposed of Hazardous Substance Consent is not considered to be required for the Proposed Project.

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Policy BAS R1 – Open Space Protection	“Within the urban areas, planning permission will not be granted for development of open space which would cause significant harm to the recreational or amenity value of the open space, or to the contribution which the open space makes to the character of the area within which it is located”.	The Order Limits have been designed to avoid built development and proposed development allocations in adopted and emerging local plans, including allocated and identified open space. However, on occasion, it is necessary for the overhead line to pass through open space to avoid settlements and conflicts with other developments. Within Basildon Council there are seven areas of open space within or adjacent to the Order limits which are identified as open space which have a recreational use. Planning Statement Appendix B (document reference 5.6.B) assesses the impact of the Project on the Angling Lake at Duckes Farm (Church Lane, Dunton). The presence of a 400kV overhead line and the need to maintain a 30m clearance for angling activities would prevent angling activities from continuing on this site. Therefore, there will be a loss of the use and function of this open space for the purposes of angling, and accordingly an assessment of provision must be made in accordance with paragraph 5.11.10 of EN-1. Following engagement with the landowner, it is understood that the site is currently used for angling on a day ticket basis. The lake is approximately 0.3ha in size, however, the existence of UKPN overhead line infrastructure already prohibits angling along the southern side of the pond. Resultantly, the provision for angling at this pond is limited. There are a range of alternative sites for angling within 5 miles of the lake, for example: • Par Fishery, West Horndon, which has two lakes totalling approximately 8.5 acres. • Puddledock Farm Fishery, which has four lakes.

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		• Northlands Park, which has two lakes totalling approximately six and a half acres. • Slough House Lake (Hayes Carp Fisheries), which is approximately 5 acres.
Brentwood Local Plan (2016-2033)		
Strategic Policy MG02: Green Belt	"A. The Metropolitan Green Belt within Brentwood Borough (as defined in the Brentwood Policies Map) will be preserved from inappropriate development so that it continues to maintain its openness and serve its key functions. Planning permission will not be granted for inappropriate development in the Green Belt other than in very special circumstances. B. All development proposals within the Green Belt will be considered and assessed in accordance with the provisions of national planning policy. C. The Council will seek to enhance the beneficial use of the Green Belt to provide or improve access to it; to provide or enhance opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity and; to improve damaged and derelict land. Development proposals in or adjacent to the Green Belt (including those the subject of allocations in this plan) will be expected to include measures to achieve these objectives so far as it is possible and appropriate...".	As detailed in Part A of the Policy, development in Green Belt areas may be considered appropriate if development is deemed to satisfy the criteria for very special circumstances. Part B of the policy notes that all development proposals within the Green Belt will be considered and assessed in accordance with the provisions of national planning policy. Paragraph 154 of the National Planning Policy Framework (NPPF) specifies that development in the Green Belt is generally considered inappropriate unless it satisfies defined exemptions. Paragraph 154(h)(ii) clarifies that engineering operations may be deemed appropriate, provided they preserve the openness of the Green Belt and do not conflict with its intended purposes. National Grid asserts that the overhead lines qualify as an "engineering operation" and should not be deemed inappropriate in the Green Belt, provided they preserve its openness and adhere to its designated purposes. This stance is further supported by Paragraph 5.11.22 of the National Policy Statement (NPS) EN-1, which discusses suitability of underground lines. Paragraph 4.2.16 of NPS EN-1 stipulates that for projects classified as Critical National Priority (CNP) Infrastructure, the Secretary of State will commence the decision-making process with the presumption that such infrastructure satisfies any tests outlined in the National Policy Statements (NPSs) or other relevant planning policies,

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		including those requiring a clear demonstration of harm being outweighed, exceptionality, or very special circumstances. Paragraph 4.2.17 reinforces this presumption, including where development is proposed within the Green Belt and requires very special circumstances for approval. Paragraph 3.3.62 of NPS EN-1 confirms the Government's recognition of a CNP for delivering nationally significant low-carbon infrastructure. CNP infrastructure is defined as nationally significant low-carbon infrastructure, encompassing electricity grid projects such as power lines within the scope of NPS EN-5, network reinforcement and upgrade works, and associated infrastructure, including substations. Therefore, the current policy position outlined in NPS EN-1 and EN-5 affirms that the proposed power lines and substation meet CNP infrastructure, satisfying the test for requiring very special circumstances to justify development, making the proposal applicable to Policy sections A and B. In relation to Part C of the Policy, the Planning Statement (document reference 5.6) discusses policy measures and consultation efforts, as detailed in Section 5.8 of the Planning Statement, which demonstrate that the Project has been carefully designed to address concerns relating to scale, massing, and visual impacts on the surrounding landscapes, biodiversity and community.
Policy BE05: Sustainable Drainage	1. "All developments should incorporate appropriate Sustainable Drainage Systems (SuDS) for the disposal of surface water, in order to avoid any increase in surface water flood risk or adverse impact on water quality. 2. Development within areas identified as a Critical Drainage Area (CDA) on the policies map, should optimise the use of Sustainable Drainage Systems by	In relation to points (1), (4) and (5) The Outline CoCP (document reference 7.2) describes the good practice measures including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's

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	providing an individually designed mitigation scheme to address the site-specific issues and risk, as informed by a site specific Flood Risk Assessment. This could be provided as part of the Drainage Strategy and must address any issues highlighted in the Surface Water Management Plan, where relevant. 3. Greenfield developments, major development and all development within a Critical Drainage Area must achieve a greenfield runoff rate. Where it is demonstrated that this is not possible on brownfield developments then a runoff reduction of 50% minimum should be achieved. The technical approach should be justified in the Drainage Strategy. 4. Applicants are required to submit a surface water Drainage Strategy and a Flood Risk Assessment for all major development as well as for all development within a Critical Drainage Area. The Drainage Strategy must include a SuDs Management Plan setting out the long-term management and maintenance arrangements. 5. SuDs will be required to meet the following design criteria: a) the design must follow an index-based approach when managing water quality. Implementation in line with the updated CIRIA SuDS Manual18 is required. Source control techniques such as green roofs, permeable paving and swales should be used so that rainfall runoff in events up to 5mm does not leave the site; b) SuDS should be sensitively designed and integrated into the Green and Blue infrastructure to create high quality public open space and	lifetime. The FRA (document reference 7.9) states that access roads and haul roads, as well as areas where impermeable material will be installed in areas where heavy equipment would be used, will also have suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff appropriate to local conditions. Appendix C of the FRA (document reference 7.9) contains further details on SuDS. (2) The Project's Order Limits are not located within an identified Critical Drainage Area (CDA) on the policies map. To comply with point (3) in line with guidance from the LLFAs, the flow restriction from the developed site shall be based on the estimated 'greenfield' run-off rate for the undeveloped site, limited to a maximum rate of 2 l/s/ha. The FRA (document reference 7.9) contains further details on 'greenfield' run-off rates. In relation to point (6) there are no plans for the Project to discharge surface water into a public sewer. Commitment GG23 of the Outline CoCP (document reference 7.2) outlines the approach to discharge of run-off. Due to the nature of the Project and its technical demands the requirements of point (7) cannot readily be incorporated into the design.

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	landscaped public realm, in line with Strategic Policy NE02: Green and Blue Infrastructure; c) maximise opportunities to enhance biodiversity net-gain; d) improve the quality of water discharges and be used in conjunction with water use efficiency measures; e) function effectively over the lifetime of the development; f) the preferred hierarchy of managing surface water drainage from any development is through infiltration measures, secondly attenuation and discharge to watercourses, and if these cannot be met, through discharge to surface water only sewers; g) have regard to Essex County Council SuDS Design Guide 2020, or as amended. 6. When discharging surface water to a public sewer, developers will be required to provide evidence that capacity exists in the public sewerage network to serve their development, in line with policy requirements in BE02 Water Efficiency and Management. 7. Development proposals should be designed to include permeable surfaces wherever possible. Proposals for impermeable paving, including on small surfaces such as front gardens and driveways, will be strongly resisted unless it can be suitably demonstrated that this is not technically feasible or appropriate".	

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Policy BE12: Mitigating the Transport Impacts of Development	1. "Developments must not have an unacceptable impact on the transport network in terms of highway safety, capacity and congestion. 2. New development proposals will be required to be supported by: a. Travel Plans, Transport Assessments and/or Statements in accordance with the thresholds and detailed requirements for each land use category as set out in the Essex County Council's Development Management Policies or its successors; and engage in an appropriate and proportionate assessment process with National Highways where development has a likelihood to have a material impact on the Strategic Road Network which is not otherwise catered for by programmed works or improvements; b. where necessary, reasonable and proportionate financial contributions and/or take reasonable measures to: i. mitigate the cumulative transport impact of the development to an acceptable degree, including relevant highways measures identified in the IDP Part B; and ii. accommodate the use of sustainable modes of transport including borough-wide sustainable transport measures identified in the IDP Part B, investment in infrastructure, services, Low Emission Zone, or measures to promote behavioural change (including enforcement)".	With regard to point (1) of the policy, the Transport Assessment (document reference 7.11) assesses the potential for disruption to infrastructure during construction. The Project is expected to generate very low-level vehicle movements during operational and maintenance phase therefore operational effects to the transport network have been scoped out of the assessment. As with all major infrastructure projects, construction of the Project will require the use of additional vehicles, although these will be low in any given month and will also be spread across the extent of the Order Limits, to limit the effect in any geographical area. The Outline Code of Construction Practice (document reference 7.2) contains a list of embedded, standard and additional mitigation measures and environmental commitments relating to air quality. As a result of all measures introduced, there are not predicted to be any significant adverse traffic and transport effects. In relation to point 2, Appendix B Outline Construction Worker Travel Plan of the Outline Construction Traffic Management Plan (CTMP) (document reference 7.3) contains the Travel Plan, setting out the good practice measures that will be in place to encourage sustainable transportation for the workforce, in a way that reduces both environmental and social impacts on the local area. The objective of the Travel Plan is to encourage a reduction in the quantity of single-occupancy car journeys and to create a shift towards more sustainable modes of transport.
Policy BE14: Creating	1. "Proposals will be required to meet high design standards and deliver safe, inclusive, attractive and accessible places. Proposals should…	Most of this policy is not relevant to the Project therefore only the relevant sub-parts will be considered which comprise of point 1 (e, f, I, j, and l) and point 2.

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Successful Spaces	e. respond positively and sympathetically to their context and build upon existing strengths and characteristics, and where appropriate, retain or enhance existing features which make a positive contribution to the character, appearance or significance of the local area (including natural and heritage assets); f. integrate and enhance the natural environment by the inclusion of features which will endure for the life of the development, such as planting to enhance biodiversity, the provision of green roofs, green walls and nature based sustainable drainage; g. where applicable, ensure that new streets are tree-lined and opportunities are taken to incorporate trees elsewhere in developments… i. avoid unacceptable overlooking or loss of privacy; j. safeguard the living conditions of future occupants of the development and adjacent residents… l. mitigate the impact of air, noise, vibration and light pollution from internal and external sources, especially in intrinsically dark landscapes and residential areas. 2. Proposals for major development should be supported by an area specific masterplan. Where appropriate, the Council will consider the use of a complementary design guide/code, to help guide the necessary design coherence across the entire development site. Design proposals will be expected to: a. demonstrate early, proactive, inclusive and effective engagement with the community and other relevant partners;	In relation to point 1 (e) the design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. The Design Development Report (document reference 5.15) provides an explanation of the main changes in the route alignment and technology following the review and consideration of feedback received to the 2024 statutory consultation and to the targeted statutory and non-statutory consultations held in 2025. A Design and Access Statement (document reference 7.15) and Design Appraisal of Site Specific Infrastructure (document reference 7.16) have also been produced sets out a summary of National Grid's approach to good design and demonstrates how National Grid has responded to the physical, environmental and socio-economic context of the overhead line route and cable end sealing compound and substation locations and responded to consultation to define the Project. The Design Development Report (document reference 5.15), Design and Access Statement (document reference 7.15) and Design Appraisal of Site Specific Infrastructure (document reference 7.16) and Design and Access Statement should be read alongside both ES Chapter 3: Alternatives (document reference 6.3), which documents the key environmental factors in consideration of the alternatives, and Chapter 5 of the Planning Statement (document reference: 5.6) which explains how planning policy, as well as the requirements of the Electricity Act and the principles of the Holford and Horlock Rules, have influenced the optioneering and design evolution process. The latter demonstrating how such policy and legislative objectives have been embedded into the design of the Project.

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	b. have regard to Supplementary Planning Documents and Guidance published by the Council, Essex County Council and other relevant bodies; c. address feedback from the Council through its Pre-application Advice Service and where appropriate, feedback from an independent Design Review Panel…".	The Design Development Report (document reference 5.15) also explains the changes that were made to the Project as a result of feedback from the consultation process. The process of reviewing and responding to consultation feedback is explained in the Consultation Report (document reference 5.1). This includes engagement with Natural England, during the statutory consultation and subsequently In relation to point 1 (f) National Grid have taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. Although there is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required the Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1). With regard to point 1 (I and j) on amenity, impacts to residential amenity as a result of the Project are considered in Appendix A4 Residential Visual Amenity Assessment of ES Chapter 13: Landscape and Visual (document reference 6.13.A4). The assessment concluded that most residential properties within the study area of 200m would not be detrimentally affected by the Project. In some instances however a high visual change of a high magnitude would be experienced and therefore mitigation measures have been recommended to reduce effects on these properties. In accordance with point 2 (a,b and c) National Grid have engaged with Brentwood Council as part of their

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		stakeholder engagement efforts including thematic meetings on various topics. The Draft SoCG with Brentwood Council (document reference 5.9.11) sets out the matters that have been agreed with Brentwood Borough Council and how the feedback received has been addressed through the design.
Policy BE16: Conservation and Enhancement of Historic Environment	"A. All Designated Assets 1. Great weight will be given to the preservation of a designated heritage asset and its setting. Development proposals affecting a designated asset, including a listed building, conservation area, registered parks and gardens, or scheduled monument, will be required to: a) sustain and wherever possible enhance the significance of the assets and its settings (including views into and out of conservation areas and their settings); b) be supported by a Heritage Statement providing sufficient information on the significance of the heritage asset (according to its importance), the potential impacts of the proposal on the character and significance of the asset and its setting, and how the proposal has been designed to take these factors into account. The Statement should make an assessment of the impact of the development on the asset and its setting and the level of harm that is likely to result, if any, from the proposed development; c) provide clear justification for any works that would lead to any harm to the asset…	Part A (1 and 4) and Part B and C are relevant to this Project. In relation to Part A (1 and 4) and Part B and C, ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets (document reference 6.11.A7) found that the Project would not result in substantial harm to any heritage assets. Whilst the Project will not result in substantial harm to designated heritage assets ES Chapter 11: Historic Environment (document reference 6.11) concludes it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. Within Brentwood Borough Council (Section G) the project would result in permanent adverse magnitude of impact to six designated assets. Whilst the Project will not

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	4. Development proposals that would be likely to cause either less than substantial or substantial harm to, or loss or partial loss of, a designated asset or its setting will be assessed in accordance with the statutory framework and national planning policy… B. Conservation Areas In addition to satisfying the relevant criteria in A above: 1. Permission for proposals which involve the demolition or partial demolition of a building in a conservation area will only be granted subject to a condition and/or a planning obligation (as appropriate) that no demolition will take place until an enforceable contract has been let for the carrying out of the new development. 2. Development will be permitted in a conservation area where the siting, design and scale of the proposed development would preserve or enhance its character or appearance and important views into and out of the area are preserved or enhanced. C. Non-Designated Heritage Assets Development proposals that affect non-designated heritage assets and their settings, including protected lanes, should seek to preserve and wherever possible enhance the asset and its setting. When considering proposals which are likely to cause harm to such an asset consideration will be given to: a) the significance of the asset and its setting; and b) the extent to which the scale of any harm or loss harm has been minimised…".	result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. A further two scheduled monuments, 24 listed buildings, two conservation areas and five non-designated heritage assets will experience a negligible/low adverse magnitude of impact, The substantial public benefits and need for the Project, as set out in Chapter 5 of the Planning Statement (document reference 5.6), including supporting the UK's net zero target, enabling the connection in East Anglia of new low carbon energy generation, and reinforcing the transmission network clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage assets of scheduled quality. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. With regard to point (c) on protected lanes within Brentwood there are a number of Protected Lanes in proximity to the Project. The Project has sought to avoid works at Protected Lanes where practicable. However, during construction, works will be required at: Little Hyde Lane. The above route would be oversailed by the Project and have temporary bellmouths installed or potentially existing accesses widened to allow access for construction vehicles. Other Protected Lanes may experience temporary increases in traffic flow.

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		National Grid has committed to restoring any landscape feature requiring removal during construction. For instance, historic hedgerows will be restored, as will historic earthworks contributing to the Protected Lane. There will also be no material increase in traffic using the Protected Lanes during the operational stage. Vegetation, earthworks (such as banks or ditches) and other boundary features (such as walls or fencing) that border protected lanes, as designated by Local Authorities, will be reinstated as close to their pre-construction condition as possible as set out in the commitments of the Outline CoCP (document reference 7.2). Pre-construction photographs will be taken to ensure a record is available to inform any reinstatement. ES Chapter 13: Landscape and Visual (document reference 6.13) and ES Appendix 13.2: Landscape Baseline and Assessment (document reference 6.13.A2), ES Appendix 13.3: Visual Baseline and Assessment (document reference 6.13.A3) and ES Appendix 13.4: Residential Visual Amenity Assessment (document reference 6.13.A4) provides an assessment of the landscape and visual impacts on Protected Lanes.
Strategic Policy NE01: Protecting and Enhancing the Natural Environment	"1. The Council will require development proposals to use natural resources prudently and protect and enhance the quality of the natural environment. All proposals should, wherever possible, incorporate measures to secure a net gain in biodiversity, protect and enhance the network of habitats, species and sites (both statutory and non-statutory) and avoid negative impacts on biodiversity and geodiversity. Compensatory measures will only be considered if it is not possible fully to mitigate any impacts.	Point 1, 2, 3, 5 and 6 are considered relevant to the Project. The below paragraphs set out a joint response to all of these points. In addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site

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	2. When determining planning applications, the council will apply the principles relevant to habitats and biodiversity as set out in National Planning Policy. International Designated Sites 3. Where a proposed development is likely to have an adverse impact on European Designated Site (whether individually or in combination with other plans or proposals) permission will not be granted unless there is due compliance with the requirements of the Habitats Regulations… Nationally Designated Sites 5. Development proposals within or outside a SSSI, likely to have an adverse effect on a SSSI (either individually or in combination with other developments), will not be permitted unless, exceptionally, the benefits of the proposed development clearly outweigh both the adverse impacts on the features of the site that make it of national importance and any impacts on the wider network of SSSIs. Sites of Local Importance 6. Development proposals that are likely adversely to affect locally designated sites, including their functional status within any identified ecological network, will only be permitted where the applicant can demonstrate that: a) the ecological coherence of the site and any local ecological network is maintained; and b) it can be demonstrated that the benefits of the development clearly outweigh the loss".	mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1). There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required. ES Chapter 3: Alternatives (document reference 6.3) and the Planning Statement (document reference 5.6) sets out how the Project had regard for designated ecological, landscape, and the historic environment sites during the routing studies. In addition, Chapter 5 of the Planning Statement (document reference 5.6) sets out how planning policy, as well as the requirements of the Electricity Act and the principles of the Holford and Horlock Rules, have influenced the optioneering and design evolution process, including limiting impacts to sites of biodiversity and geodiversity of importance, such as SSSI. The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats during the construction and operation (including maintenance) phases. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) presents the assessment of the likely significant ecology and biodiversity effects that could result from the Project. The chapter concludes there will be some temporary impact associated with the construction phase to both statutory designated sites and non-statutory designed sites. Table 8.23 in ES Chapter 8 identifies the ecology and

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		biodiversity receptors which would be impacted during construction and the mitigation to be applied to limit impacts - a number of these are within Brentwood Borough Council. These temporary impacts will be mitigated through the standard mitigation measures set out in the Outline CoCP (document reference 7.2) which will remove potential significant effects associated with dust, noise and hydrological effects on most statutory designated sites within the Study Area. Where the construction phase results in temporary habitat damage or loss the habitat will be reinstated post-construction ensuring there would be no long-term adverse impact. Some of the woodland habitats cannot be replaced due to safety clearances and therefore, mitigation in the form of compensation planting is proposed.
Strategic Policy NE02: Green and Blue Infrastructure	"1. Brentwood's network of green and blue infrastructure (GBI) will be protected, enhanced and managed to provide a multi-functional, high quality open space resource, capable of delivering opportunities for recreation, health and wellbeing, ecological connectivity, biodiversity net-gain as well as wider ecosystem services for climate change adaptation… 2. New development is expected, where possible and appropriate, to maximise opportunities to enhance or restore existing GBI provision and/or create new provision on site that connects to the wider GBI network. Its design and management should also respect and enhance the character and distinctiveness of the local area. 3. Developments on sites containing or are adjacent to a water course or water body (Blue Infrastructure) are required to ensure there is no adverse impact on the functioning or water quality of the Blue Infrastructure.	The Order Limits have been designed to avoid built development and proposed development allocations in adopted and emerging local plans, including allocated and identified open space. However, on occasion, it is necessary for the overhead line to pass through open space to avoid settlements and conflicts with other developments. There are 11 areas of open space within or adjacent to the Order Limits within Brentwood Borough Council which have been assessed in Appendix B of the Planning Statement (document reference 5.6.B). The only site where a loss of open space is identified is the Dunton Hills Family Golf Centre. The Project broadly follows the alignment of an existing high pressure gas pipeline and UKPN 132kV overhead line. The132kV UKPN overhead line will be removed and undergrounded as a part of the Project, which will result in several existing pylons at the golf course being removed.

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	Proposals that maximise opportunities to enhance or restore Blue Infrastructure and incorporate these features into the public realm of the development will be supported. An adequate undeveloped buffer zone should be applied as necessary to mitigate flood risk, in line with Policy NE09 and/0r support sustainable drainage, in line with Policy BE05. 4. Proposals should provide appropriate specification and maintenance plans for the proposed green and blue infrastructure throughout the life of the development".	During construction a temporary haul road will cross part of the golf course resulting in temporary disruption. The Pylon TB229 is proposed on the golf course, however, this will not position of pylon TB229 will not interfere with any of the holes and the removal of several pylons at the Course as part of the Project will result in an overall improvement for the site in terms of use and function. Furthermore, in justifying the Local Plan allocation at the site, Brentwood Borough Council have established that the whole course is surplus to requirements and sufficient provision exists in the locality. Therefore, the loss of a small portion of the course, which does not impinge upon the provision of golfing, so is not considered to cause a direct or indirect impact. If and in so far as the Project has an indirect impact on the use of the open space by way of introducing a visually intrusive feature in the open space in the form of oversailing conductors then such an impact is significantly outweighed by the benefits of the Project (including need), and having regard to the mitigation the Project has offered in respect of the indirect effect on the open space.
Policy NE03: Trees, Woodlands, Hedgerows	"1. Development proposals that would result in the deterioration or loss of irreplaceable and ancient and veteran trees will not be permitted other than in wholly exceptional circumstances and only if the proposals include a suitable compensation strategy. Applicants will need to demonstrate the efficacy of the strategy by reference to the value of the habitats that will be lost or harmed and provide an appropriate implementation and maintenance programme to underpin the strategy the performance of which will be subject of a condition and/or planning obligation, as appropriate.	The Project has undertaken an Arboricultural Impact Assessment (ES Appendix 13.6, document reference 6.13.A6) in accordance with British Standard 5837:2012 Trees in Relation to Design, Demolition and Construction. This has identified trees that offer significant amenity value, such as veteran trees and ancient woodland, which the The Project has been designed in a way which prioritises the retention of vegetation wherever practicable in accordance with good practice measures as outlined within the Outline CoCP (document reference 7.2). Owing to the size of the Project it has not been possible to completely avoid the loss of such natural features. The Outline LEMP

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	2. In all other cases, proposals should, so far as possible and practicable, seek to retain existing trees, woodlands and hedgerows where they make a positive contribution to the local landscape and/or biodiversity or which have significant amenity value. Wherever possible and appropriate, landscaping schemes should take account of and incorporate these existing features in the scheme and where any loss is unavoidable, incorporate measures to compensate for their loss".	(document reference 7.4) sets out the principal measures that are required to help avoid, minimise, mitigate and compensate (where relevant) the impacts to vegetation. In relation to Ancient Woodlands, the physical extent of each ancient woodland along the Project has been mapped based on a combination of aerial imagery and based on information obtained from the ground truthing woodland surveys. Table 8.23 in ES Chapter 8: Ecology and Biodiversity (document reference 6.7) lists the Ancient Woodlands identified within a 200m of the Project's Order Limits and identifies the proposed mitigation measure/commitment. The location and further information relating to all Ancient Woodlands is presented within Appendix 8.1: Habitats Report and presented on Figure A8.1.3: Ancient Woodland Locations (document reference 6.8.A1). In addition, the Project has considered 11 woodlands to be Ancient Woodland within ES Chapter 8: Ecology and Biodiversity (document reference 6.8) due to the Local Wildlife Site citations mentioning these woodlands support ancient woodland features. These woodlands have therefore been included in the impact assessment as Ancient Woodland. Potential impacts (excavation and non-excavation), in the absence of mitigation, were identified at 10 ancient woodland parcels. As a result of these Project commitments impacts associated with five ancient woodlands have been completely. The remaining 5 ancient woodlands (and the associated 15 m buffer) is unavoidable as all proposed works relate to the removal, undergrounding or modification of existing third-party infrastructure (11 kV, 33 kV, 132 kV), with the existing assets already located within the associated woodland or root protection zone. Out of the remaining ancient woodlands 2 woodlands, Little Bladen's Wood and

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		Clapgate Wood, are located within Brentwood Borough (part of Section G of the Project route). Part of Clapgate Wood (12m of the linear edge of the southern edge of the woodland) is 12 to 15 m north of proposed underground cabling of third party UKPN 11 kV overhead line mitigation. No direct loss of woodland is expected. With regards to Little Bladen's Wood the existing 132 kV overhead line within the woodland would be retained to the south with a new route to the north. A permanent access route (right of access only – no physical works) would be retained for maintenance. No direct loss of woodland is expected. A comprehensive explanation of the Project approach to ancient woodland avoidance and minimisation of impact on ancient woodland is detailed in Appendix B: Ancient Woodland and Veteran Tree Strategy (document reference 7.4.B). Unavoidable tree loss will be compensated through the implementation of landscape design including new tree planting (refer to ES Chapter 13: Landscape and Visual (document reference 6.13) and the Outline LEMP (document reference 7.4). New tree planting will use local provenance stock of native species with awareness to pests and diseases, with species and numbers outlined in the Outline LEMP. With regard to veteran trees, a desk study was undertaken to determine the location of veteran trees recorded within 30 m of the Order Limits. A full record of the identified veteran trees is included in Table 7.3 of the Outline LEMP (document 7.4). An arboricultural survey was also undertaken between May 2023 and May 2025. Figure 7.4.A13 shows the location of veteran trees. Annex D lists the veteran trees within the Study Area and identifies the assumed mitigation. The Ancient Woodland and Veteran

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		Tree Strategy Report states that based on the existing overhead line alignments without considering the LoD this is an initial assessment of veteran tree removals and impacts and all attempts should be made during detailed design to retain veteran trees where practicable (see commitment B18 in the CoCP (document reference 7.2). Ancient Woodland and Veteran Tree Strategy Report details the management outcomes for veteran trees. The final mitigation measures, remediation works and long-term monitoring are to be agreed at detailed design stage with the Project arboriculturist and the relevant landowners on a case-by-case basis. All management options discussed for veteran trees need to be achievable and therefore will need landowner consent and agreement with National Grid. Protection measures are to be in place prior to the commencement of construction or pre-construction works and require sign off by the Project Arboriculturist.
Policy NE05: Open Space and Recreational Facilities	"1. All open spaces, including the designated Urban Open Spaces, as identified will be protected and where necessary enhanced to ensure access to a network of high quality provision and opportunities for sport, play and recreation within the borough. The loss of open spaces and any ancillary facilities, such as sports, play and recreation provision, will not be permitted unless it can be demonstrated that: a) an assessment has been undertaken which clearly shows the provision and the function it performs is surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a	See response to Strategic Policy NE02: Green and Blue Infrastructure in this table.

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	suitable, accessible location within the local catchment area; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss".	
Strategic Policy NE08: Air Quality	"1. Development is required to meet national air quality standards and identify opportunities to improve air quality or mitigate local exceedances and impacts to acceptable legal and safe levels. Development proposals must demonstrate that they will not: a) Compromise the achievement of compliance targets within Air Quality Management Areas (AQMAs); b) Create new exceedance areas; and c) Create unacceptable risk of high levels of exposure to poor air quality, particularly where development is near to, or promotes land uses to be used by those particularly vulnerable to poor air quality (such as children and older adults). 2. Development proposals should be designed to minimise exposure to existing poor air quality and make appropriate provisions to improve local air quality conditions through design solutions and measures to the outdoor and indoor environment. Particular attention should be given to the positioning, layout and design of proposals for new build developments and community infrastructure (indoor and outdoor) that are likely to be used by large volumes of people on a daily basis, especially by vulnerable groups. Community infrastructure should, where possible incorporate appropriate buffer zones	The Project does not interact with any Air Quality Management Areas within Brentwood Borough Council. In accordance with points 1, 2 and 3 the Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. ES Chapter 7: Air Quality (document reference 6.7) assesses the likely air quality effects that would result from the Project and considers the existing baseline conditions and the likely changes and effects to air quality levels during the construction phase. As set out in the Scoping Report (document reference 6.19) and agreed within the Scoping Opinion (document reference 6.20), the operational phase of the Project will not result in any significant impacts to air quality and no further assessment has been carried out in the ES. AQMAs and local authority Air Quality Action Plans have been taken into consideration as a part of this assessment. The assessment confirms that with the implementation of the proposed standard mitigation measures, the effects of construction on air quality in regard to dust soiling, and human health effects are anticipated to not be significant. In relation to point 4 regard has been had to the Project's cumulative impacts on air quality as set out in ES Chapter 17: Cumulative Effects (document reference 6.17). ES

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	to prevent or minimise exposure to air pollution sources. 3. An Air Quality Impact Assessment is required as part of any planning application for: major developments… 4. Development proposals should have regard to their individual and cumulative impacts on air quality. Proposals that do not meet the requirements of (A) and (B) above will be resisted unless appropriate measures are implemented to ensure adverse impacts can be mitigated to an acceptable level. Mitigation should be provided onsite unless it can be demonstrated that it is inappropriate and that off-site provision will deliver equivalent or wider benefits".	Chapter 17 does not identify any approved or pending planning applications within Basildon Council which could have a cumulative impact on air quality.
Strategic Policy NE09: Flood Risk	"1. New development will be required to avoid areas of flood risk by applying the Sequential and, where necessary, the Exception Tests in accordance with national policy and guidance. 2. A site specific Flood Risk Assessment must assess all sources of flooding. It should demonstrate how flood risk will be managed over the development's lifetime, taking climate change into account. A site specific FRA is required, in accordance with national policy guidance, for the following types of development: a) all new development greater than 1 ha in size in Flood Zone 1; b) all development within a Critical Drainage Area; c) all new development (including minor development and change of use) in flood zones 2 and 3;	In relation to points 1, 2 and 3, the FRA (document reference 7.9) has been submitted as part of the application for development consent focussing on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. A sequential approach has been taken in siting the Project. The parts of the Project which lie in the Brentwood Borough Council area (Section G of the Project route) are mostly in Flood Zone 1. As addressed in the FRA (document reference 7.9) there are three pylons proposed in the floodplain in Section G that would need compensatory storage. The Risk of Flooding from Surface Water map (Environment Agency, 2025) shows that most of the land within Section G is at very low risk of surface water flooding. As shown in the FRA (document reference 7.9), where there are interactions between the Project and the high risk zone during construction, these are mostly where temporary haul roads and pylon construction working areas are proposed.

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	d) new development or a change of use to a more vulnerable class which may be subject to other sources of flooding. 3. Where proposals satisfy the Sequential and Exception Tests design proposals should ensure that: a) the most vulnerable land uses are located in areas within the site that are at lowest risk of flooding; b) development will be safe for its lifetime taking account of the vulnerability of its users, c) flood risk will not increase elsewhere; d) development would not constrain the natural function of the flood plain, either by impeding flow or reducing storage capacity; e) development is constructed so as to remain operational even at times of flood through resistant and resilient design; f) appropriate mitigation measures are incorporated to address any residual flood risk safely, including safe access and egress for all likely users of the development; g) where necessary incorporate flood resistant and flood resilient design measures such that, in the event of a flood, the development could be quickly brought back into use without significant refurbishment; h) incorporate sustainable drainage systems in line with Policy BE05 Sustainable Drainage, unless there is clear evidence that this would be inappropriate;	Due to its linear nature and the geographical extent of the Project, some components, namely pylons, must necessarily be located in areas with a medium and high risk of flooding (Flood Zones 2 and 3). The permanent Project works which lie within Flood Zone 3 are restricted to a small number of pylons for the overhead lines. These are designed such that they are resilient to flooding, ensuring the Project would be safe and could continue to operate. Detail on the Sequential and Exception Test are provided in Sections 5.1 and 5.2 of the FRA (document reference 7.9) submitted as part of the application for development consent. The Project is classified as 'essential infrastructure' with respect to flooding vulnerability in the NPPF. The substations and CSE compounds (none of which are located within Basildon Council), which represent the parts of the Project that are most vulnerable to flooding, are situated in Flood Zone 1, satisfying the Sequential Test. The FRA has concluded that the Project during its construction would be generally at low risk of flooding from rivers. Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures. These measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk. Permanent above ground infrastructure for the Project in the floodplain would be limited to a small number of the pylons for the overhead line. The requirements for compensation of loss of floodplain storage associated with these pylons is addressed in the following sub-section and secured by commitment W17 in the Outline CoCP (document reference 7.2).

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	i) where possible, the development will reduce flood risk overall. j) safe access and escape routes are included where appropriate, as part of an agreed Emergency Response Plan, where required. 4. Where the site is additionally located within a Critical Drainage Area (CDA), development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage".	During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the FRA. Above ground structures such as pylons and below ground structures such as the underground cable are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. In relation to point (4) no parts of the Project in Brentwood Borough Council area are located within a Critical Drainage Area. With regard to point 4, the Project does not interact with any Critical Drainage Areas within Brentwood Borough Council.
Policy NE10: Contaminated Land and Hazardous Substances	"1. Planning permission will only be granted for development on, or near to land which is suspected to be contaminated, where the Council is satisfied that: a. any risks, including to human health and the environment, can be adequately addressed in order to make the development safe; and ; b. there will be no adverse impact on the environment and quality of local groundwater or quality of surface water. 2. Proposed development on or near known or potentially contaminated land will be required to submit a Phase 1 Preliminary Risk Assessment to identify the level and type of risk and, where necessary: a. undertake a Phase 2 Intrusive Site Investigation to provide a detailed assessment of contamination and risks to all receptors;	Parts 1 and 2 are considered relevant. Parts 3 and 4 are not considered relevant as the Project will not involve the use, movement or storage of hazardous substances nor will it be located in the vicinity of such developments. ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9) considers land contamination and is supported by a Preliminary Contamination Risk Assessment (PRA) Appendix 9.1: Baseline and Preliminary Contamination Risk Assessment (document reference 6.9.A1). The PRA has identified a generally 'very low/low risk' of significant existing contamination to be present within most of the Order Limits. A worst case 'very high' risk has been identified within small discrete sections of the Order Limits – none of these are within Brentwood Borough Council. Prior to construction, any sites with a Moderate or above risk will be individually investigated and assessed in accordance with Land Contamination Risk Management

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	b. prepare a Remediation Statement providing details of a remediation scheme appropriate to the individual site; and c. submit a Validation Report prior to the construction of the development".	(Environment Agency, 2023)) to determine any additional mitigation measures or remediation requirements. The nature and scope of any mitigation or remediation would be agreed with the Environment Agency and Local Authority (as appropriate). Standard mitigation measures within the Outline Code of Construction Practice (CoCP) (document reference 7.2) will be adopted during construction to deal with unexpected land contamination. The Project will control potential contamination from the storage and use of hazardous substances and any risks from ground instability by implementing measures set out in outline Code of Construction Practice (CoCP) (document reference 7.2).
Policy R01 (I): Dunton Hills Garden Village Strategic Allocation	"In line with Policy MG01, land at Dunton Hills (east of the A128, south of the A127 and north of the C2C railway line, approximately 259.2 ha in size) is allocated for residential-led mixed-use development to deliver Dunton Hills Garden Village. The development will deliver a mix of uses to comprise around 1,650 homes in the plan period (as part of an overall indicative capacity of around 4,000 homes, the remainder to be delivered beyond 2033) together with necessary community, retail and employment development and comprehensive infrastructure to support a self-sustaining, thriving and healthy garden village".	As set out in Appendix A Committed Developments of the Planning Statement (document reference 5.6) the Project would interact with the allocation for Dunton Hills Garden Village. National Grid are engaging with the developers regarding managing interaction between the Project and the Dunton Hills Garden Village development site to ensure that both projects can come forward. The exact interaction with Dunton Hills Garden Village with regard to impacts to housing delivery is unknown given that a detailed planning application is yet to come forward showing the exact location housing and other proposed facilities. Brentwood Borough Council have raised concerns around insufficient baseline assessment undertaken by NGET in relation to the visual, heritage, amenity and land value impacts of overhead line and pylon technology at Dunton Hills Garden Village. Discussions around these topics remain ongoing, see Draft Statement of Common Ground Brentwood (document reference 5.9.11). Essex County Council have also raised concerns (see Essex County

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		Council Draft Statement of Common Ground (document reference 5.9.3)) on the effects the overhead line and pylons will have on the development with regards to potential to degrade the principles of a Garden Village and considers it is highly likely to lead to a reduction in current and future land value and property prices, which will be to the detriment of the viability and deliverability of housing and infrastructure delivery. Discussions with Essex County Council and other relevant stakeholders are ongoing.
Thurrock Core Strategy and Policies for Management of Development (as amended) (January 2015)		
CSSP4 – Sustainable Green Belt	"Balancing competing demands on the Thurrock Green Belt The Council's policy is to maintain the purpose, function and open character of the Green Belt in Thurrock in accordance with the provisions of PPG2 for the plan period. The Council will: i. Maintain the permanence of the boundaries of the Green Belt, excepting the proposed Urban Extension Broad Locations Identified in this policy, Policy CSSP 1 and as shown on the Proposals Map. ii. Resist development where there would be any danger of coalescence. iii. Maximise opportunities for increased public access, leisure and biodiversity...".	Paragraph 154 of the National Planning Policy Framework (NPPF) specifies that development in the Green Belt is generally considered inappropriate unless it satisfies defined exemptions. Paragraph 154(h)(ii) clarifies that engineering operations may be deemed appropriate, provided they preserve the openness of the Green Belt and do not conflict with its intended purposes. National Grid asserts that the overhead lines qualify as an "engineering operation" and should not be deemed inappropriate in the Green Belt, provided they preserve its openness and adhere to its designated purposes. This stance is further supported by Paragraph 5.11.22 of the National Policy Statement (NPS) EN-1, which discusses suitability of underground lines. Paragraph 4.2.16 of NPS EN-1 stipulates that for projects classified as Critical National Priority (CNP) Infrastructure, the Secretary of State will commence the decision-making process with the presumption that such infrastructure satisfies any tests outlined in the National Policy Statements (NPSs) or other relevant planning policies, including those requiring a clear demonstration of harm being outweighed, exceptionality, or very special circumstances. Paragraph 4.2.17 reinforces this

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		presumption, including where development is proposed within the Green Belt and requires very special circumstances for approval. Paragraph 3.3.62 of NPS EN-1 confirms the Government's recognition of a CNP for delivering nationally significant low-carbon infrastructure. CNP infrastructure is defined as nationally significant low-carbon infrastructure, encompassing electricity grid projects such as power lines within the scope of NPS EN-5, network reinforcement and upgrade works, and associated infrastructure, including substations. Therefore, the current policy position outlined in NPS EN-1 and EN-5 affirms that the proposed power lines and substation meet CNP infrastructure, satisfying the test for requiring very special circumstances to justify development. In this context, the precedent established by national policy takes precedence over local policy, as the reinforcement and improvement of electrical national infrastructure is deemed a matter of paramount importance at the national level.
CSTP18 – Green Infrastructure	1. "Green Infrastructure Network 2. A net gain and New Development i. The Council will require a net gain in Green Infrastructure. This will contribute to addressing the existing and developing deficiencies, ensuring connectivity and relieving pressure on designated biodiversity sites such as SSSI's. iii. Alongside the requirements for biodiversity set out in Policy CSTP19, development must contribute to the delivery of Green Infrastructure, including the acquisition, planning, design and ongoing management consistent with the emerging Greengrid SPD. A key element of this will be	Only Part 2 (I, II, III) of this policy is considered to be relevant to the Project. In relation to Part 2 National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. Although there is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required the Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of

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	connectivity and the integrity of the network; sites should not be considered in isolation. iii. Opportunities to increase Green Infrastructure will be pursued in new developments through the incorporation of features such as green roofs, green walls and other habitat/wildlife creation and also innovative technology…".	on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1).
Policy CSTP19 - Biodiversity	"Development will be encouraged to include measures to contribute positively to the overall biodiversity in the Borough. 1. The Biodiversity Network The Council will create a robust network of ecological sites centring on the Core Strategy and Policies for Management of Development (as amended) designated sites, i.e. SSSIs, SPAs, Ramsar, Local Nature Reserves and Local Wildlife Sites. These sites will be safeguarded and enhanced to mitigate the effects of past habitat loss and fragmentation, development and climate change. 2. Positive Biodiversity Management I. The Council will ensure that all designated sites are managed appropriately and will prepare suitable Biodiversity Management Plans, with partners, to demonstrate how positive management will be achieved. II. Buffering and extensions to existing sites and additional habitat will be sought through the adoption of appropriate Biodiversity Site Management Plans. III. Access will be balanced against biodiversity interest. 3. Key Sites The Council has identified the following key sites that it will work with partners to enhance, and will pursue	Points 1, 2 and 3 of this policy are relevant to the Project. With regards to point (1), as noted above in the response to Policy CSTP18 –Green Infrastructure National Grid has sought to deliver Biodiversity Net Gain by providing Environmental Areas along the Project route. There would be 1 Environmental Area in Thurrock Council around the two CSEC at Tilbury and Tilbury North Substations. In relation to point (2), the LEMP (document reference 7.4) sets out the ways in which the Environmental Areas will be maintained. The Environmental Areas are located on land to be acquired by National Grid and any habitats included within the BNG onsite mitigation will be monitored and managed by National Grid for 30 years in line with commitments made within the BNG Report (document reference 7.1). Regular site visits will be undertaken by experienced ecologists, to ensure the habitat type and condition meet that prescribed within the BNG Report (document reference 7.1). Beyond the 30-year period it is expected that ongoing management will be undertaken by National Grid in line with standard practices around permanent assets. The Project does not interact with any of the key sites listed in point (3).

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	appropriate opportunities to increase the biodiversity network in the Borough. i. East Thurrock Marshes; ii. Mardyke Valley Project; iii. Local Wildlife Sites; and iv. Living Landscapes Sites.	
Policy CSTP21 – Productive Land	"The Council recognises the importance of food security and will ensure the protection, conservation and enhancement of agriculture, productive land and soil in the Borough. 1. Ensuring appropriate land management I. The Council will promote the appropriate management and conservation of agricultural land and soil to address the changing climatic and economic environment anticipated in the future. II. Development of the best and most versatile land (DEFRA Grades 1, 2 and 3) will not be supported except in exceptional circumstances. Developers will need to demonstrate that: i. there is no suitable site in a sustainable location on land of poorer agricultural quality; or ii. alternative sites have greater value for their landscape, biodiversity, amenity, heritage or natural resources or are subject to other constraints such as flooding. The Council will take into account the importance and quality of agricultural land when considering land allocation for climate change adaptation/mitigation activities such as new fresh and salt-water habitat".	ES Chapter 6: Agriculture and Soils (document reference 6.6) assesses the potential residual effects of the Project on agricultural land use within the Order Limits. The potential presence of BMV land has been assessed through reference to published information and surveys of the areas permanently affected. The assessment sets out the total area of each land grade permanently affected and estimates the likely area of land at each grade. In Thurrock, there are 9,662 hectares of BMV land, (58.7% of agricultural land in the Borough). During construction and operation (including maintenance) there would be a moderate loss of BMV land (ALC Grades 1, 2 and 3a) from agricultural productivity, in particular at the two proposed CSEC at Tilbury and Tilbury North Substations where permanent infrastructure is proposed Table 6.13 of ES Chapter 6 quantifies the amount of BMV land impacted by this infrastructure. During construction, agricultural operations may experience disruption due to factors such as disturbance (in particular where livestock are present), fragmentation of land, access restrictions, or disruptions to water supplies and drainage. To mitigate these effects, good practice measures AS03, AS04, and AS05 outlined in the Outline CoCP (document reference 7.2) would ensure that access to affected land parcels is maintained or alternative access arrangements are communicated to landowners and occupiers.

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		The Project minimises impacts on BMV agricultural land as far as practicable and includes mitigation measures to reduce impacts on the soil resource. The permanent loss of BMV land is considered necessary on the basis that there is urgent need for CNP Infrastructure such as the Project. The routeing and siting selection process confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Project. Measures have been outlined in the Outline CoCP (document reference 7.2) to reduce the potential negative impacts on soils which are handled and disturbed, such as those to protect the quality of soils when they are stripped, stockpiled and restored and measures to reduce the disruption to agricultural activities, for example AS01 (Soil Management Measures) and AS05 (consultation with affected landowners), with all land required temporarily being returned to its preconstruction condition. With regard to soil quality, proposed soil handling measures are set out in the Outline CoCP (document reference 7.2), and accompanying Outline Soil Resource Plan (Appendix C of the Outline CoCP) to reduce the potential negative impacts on soils which are handled and disturbed, such as those to protect the quality of soils when they are stripped, stockpiled and restored. Measures are also proposed to reduce the disruption to agricultural activities - for example, AS01 (Soil Management Measures) and AS05 (consultation with affected landowners), with all land required temporarily being returned to its preconstruction condition.
Policy CSTP22 – Thurrock Design	“The Council will promote high quality design in Thurrock and will progress opportunities to improve the quality of the environment throughout the Borough and particularly in the Regeneration Areas and Key Strategic Employment Hubs.	Criterions I, III, and VII are relevant to the Project. The Project does not interact with any of the Regeneration Areas and Key Strategic Employment Hubs in Thurrock Council.

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	I. Development proposals must demonstrate high quality design founded on a thorough understanding of, and positive response to, the local context. III. In particular, the Council requires developers to demonstrate that their proposals are designed to respect the distinct positive characteristics of areas within Thurrock, whether urban or rural, and create a sense of place within their schemes. VII. Development must embrace the use of high quality design including sustainable, renewable resources of energy and low-emissions technology, and enhance Green Infrastructure...".	With regard to criterion (I) and (III) the Design Development Report (document reference 5.15), ES Chapter 3 Alternatives (document reference 6.3), Design and Access Statement (document reference 7.15) and Design Appraisal Site Specific Infrastructure (document reference 7.16) provide an overview of the design rationale for the Project. They outline how National Grid has responded to the physical, environmental and socio-economic context of the project and how the design choices have sought to reduce its environmental effects. They demonstrate that the design has incorporated mitigation measures in order to avoid or reduce significant environmental effects wherever practicable. The Design Development Report (document reference 5.15) also explains the changes that were made to the Project as a result of feedback from the consultation process. The process of reviewing and responding to consultation feedback is explained in the Consultation Report (document reference 5.1). This includes engagement with Natural England, during the statutory consultation and subsequently. The Design and Access Statement (document reference 7.15) sets out how the Project has evolved from a concept, through strategic options, route corridors and indicative alignments to the Project presented within the application for development consent. The ES Chapter 3: Alternatives document reference 6.3) includes an assessment of reasonable alternatives, and environmental considerations in choosing a preferred option and route. In relation to criterion (VI) the Project would enhance Green Infrastructure by taking opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in

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		habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. Although there is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required the Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1).
Policy CSTP23 – Thurrock Character and Distinctiveness	"The Council will protect, manage and enhance the character of Thurrock to ensure improved quality and strengthened sense of place. II. The Council requires the retention and enhancement of significant natural, historic and built features which contribute to the character of the Borough as defined by their value, quality, cultural association and meaning or their relationship to the setting and local context. i. The Council requires the retention and enhancement of strategic and local views, which contribute to a distinctive sense of place. Where development will affect these views, their sensitivity and capacity for change must be adequately assessed and the effect of the development on them appropriately tested. In order to assess the sensitivity and capacity for change of Thurrock's character, the Council will require an assessment based on The Guidelines for Landscape and Visual Impact Assessment, or other methodology supported by the Council. The Council will provide further guidance in the Design and Sustainability SPD".	Only point (II) is considered relevant to the Project. In relation to point (ii) the Project has been designed to adhere to the mitigation hierarchy, aiming to avoid or reduce impacts on the natural and historic environment through design development and embedded measures. ES Chapter 11: Historic Environment (document reference 6.11) assesses cultural heritage impacts, confirming no direct effects on heritage assets. The Project design was developed iteratively to align with policy requirements, historic landscape character assessments, and fieldwork analysis, minimising harm to cultural heritage and archaeological assets. The full assessment of the potential residual effects of the Project on landscape and visual amenity is contained in ES Chapter 13: Landscape and Visual (document reference 6.13) and ES Appendix 13.2: Landscape Baseline and Assessment (document reference 6.13.A2), ES Appendix 13.3: Visual Baseline and Assessment (document reference 6.13.A3) and ES Appendix 13.4: Residential Visual Amenity Assessment (document reference 6.13.A4). The landscape and visual amenity assessments indicate that the construction phases would result in significant negative landscape and visual amenity effects during

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		construction. These significant effects are related to the introduction of construction activity and equipment, including the loss of some landscape features including farmland and field boundary vegetation. At Year 15 of operation, following the maturation of mitigation planting, the assessment concludes that significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure projects, as set out in Paragraphs 5.10.5 and 5.10.13 of NPS EN-1. The Project has been designed carefully, and incorporates measures to mitigate harm to landscape and visual receptors, having regard to National Grid's statutory duty under Schedule 9 of the Electricity Act 1989 (in line with Paragraph 2.2.10 of NPS EN-5). However, some significant residual landscape and visual adverse effects will remain, as is inevitable with nationally significant energy infrastructure of the scale and type proposed. In the case of CNP infrastructure (such as the Project), these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure.
Policy CSTP24 – Heritage Assets and the Historic Environment	1. "Protecting and Enhancing Heritage Assets I. The Council will preserve or enhance the historic environment by: i. Promoting the importance of the heritage assets, including their fabric and their settings; ii. Encouraging the appropriate use of heritage assets and their settings; iii. Supporting increased public access to historic assets, including military and industrial heritage;	ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets.

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	iv. Reviewing the designation of local heritage assets, including considering the designation of new Conservation Areas; v. Retaining non-designated heritage assets which are considered locally important as well as those with statutory protection; and vi. Encouraging proposals that include enhancement of surrounding landscapes and integration between priority heritage assets and the Greengrid. 2. Proposed Development I. All development proposals will be required to consider and appraise development options and demonstrate that the final proposal is the most appropriate for the heritage asset and its setting, in accordance with: i. The objectives in part 1 above; ii. The requirements of PMD 4 Historic Environment; iii. Conservation Area Character Appraisals and Management Proposals as appropriate; and iv. Relevant national and regional guidance".	ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets (document reference 6.11.A7) found that the Project would not result in substantial harm to any heritage assets. Chapter 11: Historic Environment (document reference 6.11) concludes that within Thurrock Council (Section H) the project would result in permanent adverse magnitude of impact to 3 designated assets, and 4 non-designated assets due to a change in setting but this impact would be at the lower end of the spectrum of less than substantial harm. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. The substantial public benefits and need for the Project, as set out in Chapter 5 of the Planning Statement (document reference 5.6), including supporting the UK's net zero target, enabling the connection in East Anglia of new low carbon energy generation, and reinforcing the transmission network clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage assets of scheduled quality. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.
Policy CSTP25 – Addressing Climate Change	1. "Adaptation I. The Council will require climate change adaptation measures and technology to be considered from the outset in any development proposal including reduction of emissions, renewable and low carbon technologies, passive design, recycling and waste	The need for the Project is to support the connection and transfer of green, renewable energy into the NETS network. The Project would support the UK's net zero target to achieve net zero emissions by 2050 through the connection in East Anglia of new low carbon energy generation, and by reinforcing the transmission network.

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	minimisation, and through the application of green infrastructure techniques. II. The Council will work to ensure that vulnerability to climate change impacts is minimised in new development, and that such development does not increase vulnerability to climate change impacts. III. The location and layout of new buildings should minimise vulnerability to climate change. IV. Developers must consider the potential effects of climate change on their development, including: i. Water conservation and drainage ii. Need for summer cooling iii. Risk of subsidence iv. Flood risk from tidal, fluvial and surface water 2. Mitigation I. The Council will require new and existing development and associated activities to adhere to local, regional and national targets for reducing carbon emissions. II. The Council will seek the achievement and maintenance of the following minimum reductions in CO2 emissions compared to emissions in 2005: III. The Council will employ innovative methods of reducing and mitigating emissions, including the introduction of a Carbon Offset Fund".	A Greenhouse Gas Assessment (Appendix 4.1 Greenhouse Gas Assessment of ES Chapter 4: Project Description (document reference 6.4.A1)) has been prepared in support of the Project. This identifies the carbon dioxide equivalent emissions that would be released during the construction and operation of the Project. The assessment concludes that the construction and operational CO2e numbers are not considered to have a material impact on the ability of the Government to meet its carbon reduction targets and therefore are not significant. Therefore, the operational, medium to long term benefits of delivering the Project on a national level are considered to outweigh any short-term impacts of greenhouse gas (GHG) emissions because of material use and construction activities. In accordance with point 1 IV, the Project directs development to locations with the least impact on flooding or water resources. The FRA (document reference 7.9) submitted as part of the application for development consent focusses on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. A sequential approach has been taken in siting the Project. The majority of the Project lies within Flood Zone 1 and in zones that are at low risk of flooding from other sources. ES Chapter 6.12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) states that the parts of the Project which lie in Thurrock Council area (Section H of the route) avoid the Tilbury Flood Storage Area and are not within identified flood risk areas. The FRA has concluded that the Project during its construction would be generally at low risk of flooding from rivers. Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through

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		embedded and good practice measures. These measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk. During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the FRA. Above ground structures such as pylons and below ground structures such as the underground cable are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. Site waste will be managed in a structured and auditable manner in accordance with the agreed outline Code of Construction Practice (document reference 7.2) appendix 7.2B Waste Management Plan (document reference 7.2B), from the commencement of the Project., during the detailed design stage and through construction. This ensures that the aim of waste minimisation is emphasised from the outset. In addition, it would ensure that the waste produced during the construction phase is dealt with in accordance with the relevant requirements of UK legislation, as well as any other requirements specified by the relevant regulatory authorities.
Policy CSTP27 – Management and Reduction of Flood Risk	I. "The Council will ensure that flood risk management is implemented and supported through effective land use planning. The Sequential, and where necessary Exception Test, as set out in the NPPF and associated Planning Practice Guidance will be employed when allocating sites for development and an Emergency Plan for the Borough will be completed.	The FRA (document reference 7.9) has been submitted as part of the application for development consent focussing on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. A sequential approach has been taken in siting the Project. The majority of the Project within Thurrock Council lies within Flood Zone 1 and in zones that are at low risk of flooding from other sources. Due to its linear nature and the geographical

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	II. Developers will be required to incorporate sustainable drainage systems as a priority and to contribute towards flood risk management infrastructure where appropriate".	extent of the Project, some components, namely pylons, must necessarily be located in areas with a medium and high risk of flooding (Flood Zones 2 and 3).. The requirements for compensation of loss of floodplain storage associated with the pylons is addressed in the following sub-section and secured by commitment W17 in the Outline CoCP (document reference 7.2). No discernible loss of floodplain storage is associated with the CSE compound, associated above ground infrastructure has a very limited footprint. With regard to sustainable drainage the Outline CoCP (document reference 7.2) describes the good practice measures including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime. The FRA (document reference 7.9) states that access roads and haul roads, as well as areas where impermeable material will be installed in areas where heavy equipment would be used, will also have suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff appropriate to local conditions. Appendix C of the FRA (document reference 7.9) contains further details on SuDS. The FRA (document reference 7.9) concludes that the Order Limits avoid encroaching into Areas of Critical Drainage.
Policy CSTP31 – Provision of Minerals	1. "Land Won Minerals I. The Council will endeavour to maintain a landbank of at least 7-years and aim to meet the sub-regional apportionment of 0.14mt per annum of sand and	The Project has sought to avoid direct interactions with existing minerals sites, where possible, as described within Appendix 9.2: Qualitative Minerals Resource and Infrastructure Assessment (document reference 6.9.A2).

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	gravel throughout the Plan period or meet any subsequent change in the period as agreed by national policy or as a result of a review of the regional apportionment. The Council will assess the provision of the landbank through its monitoring framework. II. To ensure the prudent use of Thurrock's mineral resources: i. Mineral working will only be permitted where there is an identified national, regional or local need and the sites fall within the criteria policies outlined in the forthcoming Thurrock Local Plan. ii. The forthcoming Thurrock Local Plan will identify 'Preferred Areas' located within the Minerals Safeguarding Area (MSA) (Policy CSTP32) which, if granted planning permission, will contribute to maintaining the sand and gravel annual apportionment and the 7- year landbank. Sites will be phased depending on the identified need, based upon the requirements outlined above (see Table 13) to 2021 or beyond, where the site will contribute to maintaining the 7-year landbank and meeting the sub-regional apportionment throughout the Plan period. 2. Recycled and Secondary Aggregate Subject to the waste policies of this plan the Council will encourage the use of facilities for recycling aggregate or secondary materials, or processing of such materials, as alternatives to land won aggregate. Proposals on unallocated sites which do come forward must meet the criteria set out in the forthcoming Thurrock Local Plan".	However, some sections of the Order limits are within an MSA for sand and gravel – see response to Policy CSTP32, below. Further details on how the Project interacts with minerals sites are given in ES Chapter 9 Contaminated Land, Geology and Hydrogeology (document reference: 6.9). The ES Chapter concludes that discussions with the existing minerals operators are ongoing to agree appropriate mitigation for any potential impacts on these sites.
Policy CSTP32 –	1. "Mineral Safeguarding Area All site allocations for mineral extraction identified in the forthcoming	The Project has sought to avoid direct interactions with existing minerals sites, where possible, as described within

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Safeguarding Minerals Resources	Thurrock Local Plan will be based on the MSA to be identified in the forthcoming Thurrock Local Plan and on the Proposals Map. All areas identified in the MSA will be safeguarded from non-mineral related development. Applications for non-mineral related development on the site allocations will be assessed against the policies provided in the forthcoming Thurrock Local Plan. 2. Aggregate Recycling and Secondary Processing Sites The permanent authorised aggregate recycling capacity will be safeguarded from non-mineral related development, unless the proposals meet the criteria outlined in the forthcoming Thurrock Local Plan and/or the site is identified for alternative use in the forthcoming Thurrock Local Plan. 3. Coated materials and concrete products. The permanent authorised facilities for concrete batching, manufacture of coated materials and concrete products, and the handling, processing and distribution of substitute, recycled and secondary aggregate material will be safeguarded from non-mineral related development, unless the proposals meet the criteria outlined in the forthcoming Thurrock Local Plan and/or identified for alternative use in forthcoming Thurrock Local Plan. All safeguarded sites will be allocated in the forthcoming Thurrock Local Plan. Aggregate Wharves All existing aggregate wharves will be safeguarded against proposals which prejudice their use for the importation of aggregates. The Council will favour proposals which contribute to the importation of aggregates where they accord with the policies in the forthcoming Thurrock Local Plan. New sites for possible	ES Appendix 9.2: Qualitative Minerals Resource and Infrastructure Assessment (document reference 6.9.A2). Figure 11 of the Thurrock Environmental Capacity Statement (ECS) indicates that sections of the Order Limits are within a MSA for sand and gravel. The following safeguarded existing minerals infrastructure sites are indicated to interact with the Order Limits: • Burrows Farm, Brentwood Road, Bulphan • Orsett Quarry • Rainbow Shaw Quarry • Mill House Farm • Dansand Quarry, Stanford Road None of the works will take place within the boundaries of the above referenced sites. The closest interaction with these sites will be through utilisation of the existing road network in nearby proximity which will not compromise their value for minerals extraction. Further details on how the Project interacts with minerals sites are given in ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9). The ES chapter concludes that discussions with the existing minerals operators are ongoing to agree appropriate mitigation for any potential impacts on these sites.

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	aggregate wharves will be encouraged through policies in the forthcoming Thurrock Local Plan".	
Policy PMD1 – Minimising Pollution and Impacts on Amenity, Health, Safety and the Natural Environment	1. "Development will not be permitted where it would cause or is likely to cause unacceptable effects on: i. The amenities of the area; ii. The amenity, health or safety of others; iii. The amenity, health or safety of future occupiers of the site; or iv. The natural environment. 2. The Council will require assessments to accompany planning applications where it has reasonable grounds to believe that a development may suffer from, or cause: air pollution, noise pollution, contaminated land/soil, odour, light pollution and shadow flicker, water pollution, invasion of privacy, visual intrusion, loss of light, ground instability, vibration".	Parts 1 and 2 of this policy are relevant to the Project. The Project accords with this policy as set out below, where the relevant sub-parts of this policy are identified: Point (1) ES Chapter 10: Health and Wellbeing (document reference 6.10) assesses the Project's impact to health and wellbeing. The assessment concludes that likely significant effects during construction, operation, and maintenance phases have been minimised through embedded mitigation such as sensitive routeing and compliance with design safety standards, and standard mitigation measures set out in the Outline CoCP (document reference 7.2) that will be adopted during construction to avoid and reduce as far as practicable effects on identified environmental and socio-economic receptors. Point (3) ES Chapter 14: Noise and Vibration (document reference 6.14) presents the assessment of the likely significant noise and vibration effects that could result from the construction of the Project. The Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects in accordance with Paragraph 4.1.5 of NPS EN-1. The assessment concluded with the relevant standard mitigation measures and best practicable means (BPM) set out in Appendix F: Outline Noise and Vibration Management Plan to the Outline CoCP (document reference 7.2) relating to noise and vibration the residual effect of construction noise will not be significant to all nearby NSRs during both daytime and nighttime periods. Further detailed construction noise and vibration assessments will be undertaken by the main works contractor(s) prior to commencing works.

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		Operational noise from overhead lines is scoped out of the ES, in accordance with the Scoping Opinion (document reference 6.20), on the basis that a low noise conductor system is proposed. However, additional information regarding operational noise impacts from the EACN Substation, Tilbury North Substation and overhead lines is provided for information in ES Appendix 14.3: EACN Substation Operational Noise Assessment (document reference 6.14.A3), ES Appendix 14.4: Tilbury North Substation Operational Noise Assessment (document reference 6.14.A4) and ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) (document reference 6.14.A5) respectively. In relation to contaminated land ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9) considers land contamination and is supported by a Preliminary Contamination Risk Assessment (PRA) (ES Appendix 9.1: Baseline Information and Preliminary Contamination Risk Assessment (document reference 6.9.A1)). The PRA has identified a generally 'very low/low risk' of significant existing contamination to be present within most of the Order Limits. A worst case 'very high' risk has been identified within small discrete sections of the Order Limits, none of which lie within Section H. Standard mitigation measures within the Outline CoCP (document reference 7.2) will be adopted during construction to deal with unexpected land contamination. Significant effects on soil quality will be minimised through the use of monitoring techniques as set out in Section 6.8 of ES Chapter 6: Agriculture and Soils (document reference 6.6) and mitigation measures set out in the Outline CoCP (document reference 7.2).

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		The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. ES Chapter 7: Air Quality (document reference 6.7) assesses the likely air quality effects that would result from the Project and considers the existing baseline conditions and the likely changes and effects to air quality levels during the construction phase. As set out in the Scoping Report (document reference 6.19) and agreed within the Scoping Opinion (document reference 6.20), the operational phase of the Project will not result in any significant impacts to air quality and no further assessment has been carried out in the ES. The assessment confirms that with the implementation of the proposed standard mitigation measures, the effects of construction on air quality in regard to dust soiling, and human health effects are anticipated to be not significant. ES Chapter 10: Health and Wellbeing (document reference 6.10) details the assessment of the potential residual effects of the Project on Health and Wellbeing. The assessment includes a series of embedded and standard mitigation measures considered as part of the integral environmental appraisal considered from the outset. Section 10.7 of ES Chapter 10 demonstrates that the likely significant effects of the Project can be mitigated through the proposed measures, such to comply with National, Regional and Local Policy. These measures have been informed through the engagement and consultation activities that have taken place with stakeholders, which has helped to provide for a well-informed approach that takes into account local demographics and health considerations.

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		In relation to contaminated land ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9) presents an assessment on the likely significant effects of the Project with regards to contamination of soil and groundwater and impacts to geology. The assessment identifies the potential for new contamination as a result of the Project's construction phase. The assessment concluded that with outlined mitigation measures, temporary construction impacts from existing or new contamination are expected to be minimal. Effects on groundwater receptors and construction workers are considered negligible and not significant. With regard to light pollution, ES Chapter 8: Ecology and Biodiversity (document reference 6.8) and ES Chapter 13: Landscape and Visual (document reference 6.13) present the assessment of likely significant ecology and biodiversity, and landscape and visual effects that could result from the Project including lighting impacts. The assessment of lighting in both these ES chapters has been based on the assumptions that: All works associated with substation - exterior and interior lighting would be provided at the site to allow for safe movement and the operation of equipment. All lighting would be designed in accordance with the appropriate design standards and be motion-sensor activated. A typical construction day will consist of 12-hours meaning in winter this would require working in the dark at either end of the day. For the purposes of the ES, it is therefore assumed that winter working will require lighting at certain sites but will not be wide scale across the Project. The Outline CoCP (document reference 7.2) sets out the good practice measures to protect Ecology, Biodiversity, and Landscape and Visual environments during

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		construction and operation. Key measures include directional and minimised construction lighting (LV03), locating potentially disruptive activities and equipment away from sensitive receptors like residential areas and ecological sites where practicable (GG22), designing permanent lighting to minimise impacts on adjacent properties, protected species, and habitats (GG31), and ensuring construction lighting is switched off when not in use and positioned to avoid spillover onto nearby land or vegetation (B06).
Policy PMD4 – Historic Environment	"The Council will ensure that the fabric and setting of heritage assets, including Listed Buildings, Conservation Areas, Scheduled Monuments and other important archeological sites, and historic landscape features are appropriately protected and enhanced in accordance with their significance. 1. The Council will also require new development to take all reasonable steps to retain and incorporate non-statutorily protected heritage assets contributing to the quality of Thurrock's broader historic environment. 2. Applications must demonstrate that they contribute positively to the special qualities and local distinctiveness of Thurrock, through compliance with local heritage guidance including: i. Conservation Area Character Appraisals; ii. Conservation Area Management Proposals; iii. Other relevant Thurrock-based studies, including the Landscape Capacity Study (2005), the Thurrock Urban Character Study (2007) and the Thurrock Unitary Historic Environment Characterisation Project (2009). iv. Further local guidance as it is developed.	National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. ES Chapter 3: Alternatives (document reference 6.3) documents the key environmental factors that were considered in the optioneering and design evolution process. ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the likely significant cultural heritage effects that could result from the Project. ES Appendix 11.2: Historic Environment Assessment Tables (document reference 6.11.A2) includes an assessment of the impacts on listed buildings. The ES chapter concludes that the Project would not result in substantial harm to any heritage assets. Within Section H the Project would result in less than substantial harm to 2 designated assets. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the

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	3. The Council will follow the approach set out in the NPPF in the determination of applications affecting Thurrock's built or archaeological heritage assets including the expectation that the relevant historic environment record will be consulted and the heritage asset(s) assessed using appropriate expertise where necessary. This will include consideration of alterations, extensions or demolition of Listed Buildings or the demolition of unlisted buildings within Conservation Areas, and requirements for pre-determination archaeological evaluations and for preservation of archaeology in situ or by recording".	introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. The substantial public benefits and need for the Project, as set out in Chapter 5 of the Planning Statement (document reference 5.6), including supporting the UK's net zero target, enabling the connection in East Anglia of new low carbon energy generation, and reinforcing the transmission network clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage assets of scheduled quality. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Within Section H, seven priority geophysical surveys have been identified with four completed to date (June 2025). The geophysical anomalies at three locations are considered to be natural features. Possible archaeological features have been identified in the survey area around Tilbury North Substation. Full details are provided in ES Appendix 11.4: Geophysical Survey Results Report (document reference 6.11.A4). Four priority archaeological trial trench surveys are proposed. The results from these surveys will be reported in ES Appendix 11.5: Trial Trenching Results Report (document reference 6.11.A5). With regards to archaeology mitigation measures to reduce impacts on archaeology are set out in the Archaeological Mitigation Strategy and Outline WSI (document reference 7.5) and includes preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction.

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Policy PMD5 – Open Spaces, Outdoor Sports and Recreational Facilities	"Existing Facilities 1. The Council will safeguard all existing open spaces, outdoor sports and recreational facilities. Development proposals that would result in their complete or partial loss or cause or worsen a deficiency in the area served by the space or facility will not be permitted unless: i. conveniently located and accessible alternative facilities of an equivalent or improved standard will be provided to serve current and potential new users; or improvements to remaining spaces or facilities can be provided to a level sufficient to outweigh the loss; ii. proposals would not negatively affect the character of the area and/or the Greengrid. Any alternative and improved facilities should be available for use before an existing open space or facility is lost. 2.The Council may also allow: i. a partial loss of an open space or outdoor sports pitch site, where that partial loss would be due to the development of facilities ancillary to the use of that space or site (e.g. changing rooms) and would not result in a loss in the quality or number of pitches provided and their use; or ii. the redevelopment of an existing open space, outdoor sports or recreational facility where redevelopment would incorporate a type of open space, outdoor sports, or recreational facility for which there is greater need".	The Project has sought to avoid works within areas of designated open space throughout. Table B.1 of Appendix B Open Space Assessment of the Planning Statement (document reference 5.6) provide an overview of open spaces that are located within or adjacent to the Order Limits of the Project. In Thurrock, the Project interacts with nine areas of open space, as defined in EN-1. Two sites (Maple Park and Orsett Golf Course), will be impacted by the Project in a way which results in the partial loss of open space due to the siting of pylons on this land. Appendix B of the Planning Statement (document reference 5.6) justify these losses when considered against EN-1, respectively. The partial loss of open space in these locations will conflict with Policy PMD5. However, the overall benefits of the Project are considered to outweigh this conflict.
Policy PMD6 – Development	"The Council will maintain, protect and enhance the open character of the Green Belt in Thurrock in accordance	Paragraph 154 of the National Planning Policy Framework (NPPF) specifies that development in the Green Belt is

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in the Green Belt	with the provisions of the NPPF. The Council will plan positively to enhance the beneficial use of the Green Belt by looking for opportunities to provide access to the countryside, provide opportunities for outdoor sport and recreation, to retain and enhance landscapes, visual amenity and biodiversity, and to improve damaged and derelict land. Planning permission will only be granted for new development in the Green Belt provided it meets as appropriate the requirements of the NPPF, other policies in this DPD".	generally considered inappropriate unless it satisfies defined exemptions. Paragraph 154(h)(ii) clarifies that engineering operations may be deemed appropriate, provided they preserve the openness of the Green Belt and do not conflict with its intended purposes. National Grid asserts that the overhead lines qualify as an "engineering operation" and should not be deemed inappropriate in the Green Belt, provided they preserve its openness and adhere to its designated purposes. This stance is further supported by Paragraph 5.11.22 of the National Policy Statement (NPS) EN-1, which discusses suitability of underground lines. Paragraph 4.2.16 of NPS EN-1 stipulates that for projects classified as Critical National Priority (CNP) Infrastructure, the Secretary of State will commence the decision-making process with the presumption that such infrastructure satisfies any tests outlined in the National Policy Statements (NPSs) or other relevant planning policies, including those requiring a clear demonstration of harm being outweighed, exceptionality, or very special circumstances. Paragraph 4.2.17 reinforces this presumption, including where development is proposed within the Green Belt and requires very special circumstances for approval. Paragraph 3.3.62 of NPS EN-1 confirms the Government's recognition of a CNP for delivering nationally significant low-carbon infrastructure. CNP infrastructure is defined as nationally significant low-carbon infrastructure, encompassing electricity grid projects such as power lines within the scope of NPS EN-5, network reinforcement and upgrade works, and associated infrastructure, including substations. Therefore, the current policy position outlined in NPS EN-1 and EN-5 affirms that the proposed power lines and

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		substation meet CNP infrastructure, satisfying the test for requiring very special circumstances to justify development. In this context, the precedent established by national policy takes precedence over local policy, as the reinforcement and improvement of electrical national infrastructure is deemed a matter of paramount importance at the national level.
PMD7- Biodiversity, Geological Conservation and Development	2. "Development proposals will be required to demonstrate that any significant biodiversity habitat or geological interest of recognised local value is retained and enhanced on-site. Where it can be demonstrated that this is not possible, and there is no suitable alternative site available for the development, developers will be required to show that their proposals would mitigate any loss of biodiversity or geological interest. In circumstances where it can be demonstrated that neither retention on site nor mitigation is possible, developers will be required to provide appropriate compensation for any significant loss of biodiversity or geological interest, such that there is no overall net loss of biodiversity habitat or features of geological conservation interest in Thurrock. The Council will seek to achieve net gains in biodiversity where such gains would be possible, with particular reference to the desirability 3. The Council will not permit development that would result in the loss, or partial loss, of a locally designated biodiversity or geological site, except in exceptional circumstances where it can be demonstrated that there is no alternative, subject to the sequential approach outlined in (1) above. 4. To enable the Council to determine an application which would result in a loss of biodiversity or	In accordance with parts 1, 2 and 3, ES Chapter 8: Biodiversity (document reference 6.8) presents the assessment of the likely significant ecology and biodiversity effects that could result from the Project. The chapter concludes there will be some temporary impact associated with the construction phase to both statutory designated sites and non-statutory designed sites. These temporary impacts will be mitigated through the standard mitigation measures set out in Outline CoCP (document reference 7.2) which will minimise potential significant effects associated with dust, noise and hydrological effects on most statutory designated sites within the study area. Where the construction phase results in temporary habitat damage or loss the habitat will be reinstated post-construction ensuring there would be no long-term adverse impact. Some of the woodland habitats cannot be replaced due to safety clearances requirements and therefore, mitigation in the form of compensation planting is proposed. The CoCP measures will be secured by requirement 4 in the draft Development Consent Order (document reference 3.1). The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, during the construction and operation (including maintenance) phases.

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	geological value, the developer will be required to submit a detailed justification setting out: i. why the loss is considered to be unavoidable ii. an assessment of what species and habitat would be lost or adversely affected as a result of development (including an ecological survey where appropriate) iii. how the loss or adverse effect is proposed to be mitigated onsite through habitat restoration or creation; and/or compensated for through the acquisition and management of a suitable site within the area, or a financial contribution towards the purchase and management of such a site or management of an existing site to bring it up to a necessary standard. 5. Thurrock Council will require development proposals to incorporate biodiversity or geological features into the design as far as possible. These may include green roofs, brown roofs and the creation of green corridors for wildlife. Where it is necessary to secure the biodiversity or geological interest of a development site, the Council will seek the provision and implementation of a Biodiversity or Geological Management Plan through planning obligations. The Council will evaluate development proposals and biodiversity management plans or geological management plans against recognised best practice".	draft Development Consent Order (document reference 3.1). In relation to point 4, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. Although there is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required the Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1). In Thurrock the Project proposes two Environmental Areas where the BNG would be delivered, one around the CSECs at Tilbury and another at Tilbury North Substation. With regard to point 5, the Outline LEMP (document reference 7.2) prepared in support of this Project constitutes a biodiversity plan by setting out the management initiatives for the Environmental Areas.
Policy PMD10 – Transport Assessments	"Transport Assessments, Transport Statements, and Travel Plans must accompany planning applications in accordance with the Department for Transport guidance in Guidance on Transport Assessments (March 2007).	The Transport Assessment (document reference 7.11) assesses the potential for disruption to infrastructure during construction. The Project is expected to generate a very low level of vehicle movements during operational and

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning the Policy
and Travel Plans	Proposed mitigation measures will either be implemented in their entirety by or on behalf of the developer or will be implemented as part of a wider pooling of resources. Developers will be required to make provision for the objectives of the agreed Travel Plans to be monitored. Agreed Travel Plans will include targets, coupled with penalties if outcomes are not being met. Where adequate affordable mitigation is not secured or achievable and the residual cumulative impacts of development proposals are likely to be severe, such developments will be resisted".	maintenance phase therefore operational effects to the transport network have been scoped out of the assessment. The conclusions presented in ES Chapter 16: Traffic and Transport (document reference 6.16) demonstrate that with mitigation measures, the assessment of traffic generated during construction and operation (including maintenance) of the Project will not result in significant adverse effects on road users, equestrians, walkers, cyclists and horse riders and road links in terms of delay, severance, amenity, fear and intimidation, accidents and road safety, and parking and loading. Embedded mitigation measures comprise of the inclusion of a largely continuous haul road to be used by construction vehicles reducing construction traffic on the local road network. Appendix B Outline Construction Worker Travel Plan of the Outline CTMP (document reference 7.3) contains the Travel Plan, setting out the good practice measures that will be implemented during construction to encourage sustainable transportation for the workforce, in a way that reduces both environmental and social impacts on the local area. The objective of the Travel Plan is to encourage a reduction in the quantity of single-occupancy car journeys and to create a shift towards more sustainable modes of transport. The Travel Plan does not include a consideration of operational travel given this has been scoped out of the assessment.
Policy PMD15 – Flood Risk Assessment	1. "Applications relating to sites not covered by the Thurrock Sequential Test will be required to be supported by a site-specific Sequential Test to demonstrate compliance with the NPPF, and associated Planning Practice Guidance. To reflect the nature of Thurrock's defended floodplain, particular reference should be made to the hazard rating for	Only parts 1, 2 and 3 of this policy are relevant to the Project. The FRA (document reference 7.9) has been submitted as part of the application for development consent focussing on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. The FRA explains that a sequential approach has been taken in siting the Project.

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning the Policy
	each site were covered by the Thurrock Strategic Flood Risk Assessment. 2. Only those applications classified under the 'minor development' or 'changes of use' categories will be exempt from both the Sequential and Exception Tests, and 'water compatible' development will be exempt from the Exception Test. All developments will still be expected to meet the requirements for Flood Risk Assessments. Development proposals subject to the Exception Test in Thurrock must show that the following criteria have been met (in addition to FRA requirements outlined in the NPPF and associated Planning Practice Guidance): I. In addressing that part of the Exception Test requiring demonstration that the development provides wider sustainability benefits to the community that outweigh flood risk, reference should be made to the main assessment criteria outlined in the Thurrock Sustainability Appraisal and any opportunities to reduce the overall flood risk posed to the community, including schemes to make space for water; II. The FRA must demonstrate that the development will be 'safe', without increasing flood risk elsewhere, and where possible will reduce flood risk overall. For Thurrock, this will mean addressing the following points in particular: i. Flood hazard must be fully considered and reference should be made in the site-specific FRA to the SFRA, or site-specific modelling. This should be used to inform a sequential approach to planning within the site; ii. Where it is deemed acceptable to reduce flood storage as a result of development, level for level	The parts of the Project located in Thurrock Council area (Section H of the Project route) are mostly located in Flood Zone 1, comprising of pylons and two CSE compounds at Tilbury North Substation therefore there is no requirement to apply the Sequential Test in order to demonstrate that the development can be delivered on sites in areas with a lower probability of flooding. Detail on the Sequential and Exception Test are provided in Sections 5.1 and 5.2 of the FRA (document reference 7.9) submitted as part of the application for development consent. The Project is classified as 'essential infrastructure' with respect to flooding vulnerability in the NPPF. The substations and CSE compounds, which represent the parts of the Project that are most vulnerable to flooding, are situated in Flood Zone 1, satisfying the Sequential Test. Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures. These measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk. During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the FRA. Above ground structures such as pylons and below ground structures such as the underground cable are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. In relation to point (v) the Outline CoCP (document reference 7.2) describes the good practice measures

Local Policy Reference	Policy Wording	How the Project has had regard to Local Planning the Policy
	compensation storage must be provided to ensure that there is no increased flood risk elsewhere; iii. Where appropriate, an emergency plan for the development must be submitted that is consistent with the emergency plan for the area. This will include evidence that 'more vulnerable' development can achieve safe access/egress to a communal refuge point or unaffected area accessible to the emergency services. In highly exceptional cases where access/egress to a place of safe refuge cannot be achieved, these will be considered on their individual merits; iv. Where appropriate, flood avoidance, flood resistance and flood resilience measures must be incorporated into the design of any development v. Evidence that surface water management schemes, and other flood defence measures that are required on-site in order to allow a development to take place will be adequately maintained for the lifetime of that development by the site owner iv. Evidence that the proposed development will not interfere with the potential for future maintenance or improvements to flood defences".	including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime. The FRA is therefore considered to satisfy all the relevant parts of this policy.

Signposting for how the Project has had regard to Neighbourhood Development Pans

Table 1.6 Signposting with Neighbourhood Plan Policy

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
Section A			
Swainsthorpe Neighbourhood Plan	Development stage. The Neighbourhood plan is yet to be adopted.		
Mulbarton (23 February 2016)	Policy ENV1: Conservation Area and Heritage Assets	In addition to Listed Buildings, the Mulbarton Conservation Area Appraisal identified Buildings of Townscape Value, Important Trees and Important Groups of Trees and Important Hedgerows, all of which contribute further to the character of the Mulbarton Conservation Area. These features will also be protected and enhanced under this policy. New development in or adjacent to the Conservation Area and near important features shown on Map 3 should take account of the historic fabric of the area and should preserve or enhance the character or appearance of the Conservation Area. A statement should be provided in support of all development proposals within or adjacent to the Conservation Area and other designated heritage assets. Such statements should outline the significance of any heritage assets affected and any adverse impacts that the development may have on heritage assets. It should also include any proposed mitigation measures, as well as how the proposed development will contribute to the character and setting of the relevant heritage asset(s).	The Project is routed outside of the Mulbarton Conservation Area. ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the likely significant cultural heritage effects that could result from the Project. For the Mulbarton Conservation Area, it was concluded that its setting does not extend to the order limits, as such it was scoped out of the Environmental Assessment. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
	Policy ENV2: The Common	The Common will be conserved and enhanced as a managed environment, adequately balancing its landscape and biodiversity value with its value as a space for amenity use and public enjoyment. All development proposals will need to demonstrate that this balance is not disturbed.	Noted. The Project has been routed to avoid The Common.
	Policy ENV3: The Local Environment	In order to minimise further opening up of the landscape, all road fronting hedgerows in Mulbarton affected by development requiring consent should be protected and, wherever possible, enhanced. Any hedgerow lost as a result of such development will be expected to be compensated elsewhere within the site, if possible, or elsewhere in the vicinity. Proposals that would lead to the enhancement of ecological network will be encouraged, particularly where they would further support the management of the County Wildlife Site and improve habitat connectivity. Supplementary planting which strengthens the existing network of hedgerows will also be encouraged.	The Outline Code of Construction Practice (CoCP) (document reference 7.2) sets out the required mitigation measures and environmental commitments that will be implemented during the construction phase of the Project. This includes measures B12 which states that '*Where temporary habitat removal is required to facilitate construction, this will be reinstated. Reinstatement will aim to provide habitats of equal or better value to those affected and permanent land take will be compensated; minimum of 10% BNG will be achieved. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once re-established*'.
	Policy ENV4: Flood Risk	Development should not increase flood risk from fluvial flooding or any other source of flooding, including surface water flooding. Planning applications for development within the plan area must be accompanied by a site-specific assessment in line with the requirements of	Flood Risk Assessment (FRA) (document reference 7.9) has been submitted as part of the application for development consent focussing on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		national policy and advice but may also be required on a site by site basis based on locally available evidence. All proposals must demonstrate that flood risk will not be increased elsewhere and that the proposed development is appropriately flood resilient and resistant.	A sequential approach has been taken to siting infrastructure for the Project, particularly those elements that are vulnerable to inundation. Pylons and below ground structures such as the underground cables are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. The section of overhead line through Mulbarton is routed through Flood Zone 1.
Newton Flotman Neighbourhood Plan	The Neighbourhood plan is yet to be adopted. Consultation on the Plan took place between 10th March and 23rd April 2025. The next stage is for the Neighbourhood Plan to undergo an independent examination.		
Diss and District (28th September 2023)	Policy 7 – Surface Water Management	Development proposals should be designed to manage flood risk effectively and not increase, and wherever possible reduce, the overall level of flood risk both to the site and elsewhere, with solutions appropriate to the low-lying nature of the area. Proposals specifically to improve surface water drainage, such as works to reinstate an effective drainage scheme, will be supported. Any new development or significant alteration of an existing building should be accompanied by a proportionate assessment that gives and appropriate consideration to all sources of flooding and proposed surface water drainage. Proposals should incorporate Sustainable Drainage Systems (SuDS) that are appropriate to the scale and nature of the development and	A sequential approach has been taken to siting infrastructure for the Project, particularly those elements that are vulnerable to inundation. The Local Flood Risk Management Strategy identifies that the low-lying areas along the River Waveney are at risk of fluvial and tidal flooding, with a history of tidal surge flooding. The Order Limits cross the Waveney to the west of Diss. ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) and the Flood Risk Assessment (document reference 7.9) identifies that pylons RG0087 and RG0088 would result in the loss of 12m^3 of floodplain storage. As a response to the Environment Agency stipulation compensatory storage for

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		designed to be an integral part of the green infrastructure. These may include: a) Attenuation ponds; b) Planting; c) Introduction of permeable driveways or parking areas; d) Rainwater harvesting and storage features; e) Green roofs. To mitigate against the creation of additional impermeable surfaces, there should be attenuation of greenfield (or for redevelopment sites as close to greenfield as possible) surface water runoff rates and runoff volumes within the development site boundary. These measures will be required unless the developer can provide justification to demonstrate that it is neither practicable nor feasible within the constraints or configuration of the site	pylons within the floodplain would be required. Floodplain storage compensation areas would be located on land outside of the floodplain within the Order Limits. The proposed location of the compensation areas is shown on ES Figure 4.2: Proposed Project Design – Permanent Features (document reference 6.4.F2). The compensation areas would be hydraulically linked to the area of loss, such that storage volume is replaced within the floodplain cell in which it is lost. The areas would also be designed to drain following a flood event. Given the very small volumetric losses (individually and cumulatively) it has been agreed with the Environment Agency that hydraulic modelling to demonstrate the effectiveness of the storage provision would not be required.
	Policy 8 – Green Corridors and Biodiversity Enhancement	The Plan identifies the management, enhancement, and creation of wildlife habitats within the green corridors identified in Map 17 as a key priority. They will be a focal point for local conservation to create a more joined up Green Infrastructure Network and where possible increased public access, helping people to experience wildlife first-hand. Development proposals should respond positively to the identified green corridors (shown in Map 17). Proposals for new development within or adjacent to a green corridor should deliver	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) assesses the potential impacts of the Project's construction, operation, and maintenance phases on ecological and biodiversity receptors. Habitat connectivity will be preserved where possible by utilising existing access routes, minimising working widths through biodiversity receptors, and maintaining connectivity via green corridors such as hedgerows and watercourses.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		measurable net gains in biodiversity in accordance with national or local policy requirements or deliver qualitative improvement to the corridor relating to the quality of habitat or its ability to facilitate movement of fauna or flora. Proposals in the vicinity of green corridors should maintain, and where practicable enhance, the function of the corridor and demonstrate how they will mitigate any unacceptable harm to wildlife in the corridor concerned. Development proposals should maximise habitat opportunities to make provision for local wildlife and to promote the freedom of movement of wildlife through development sites. Existing natural features within development sites should be retained wherever practicable.	The Outline CoCP (document reference 7.2) sets out the required mitigation measures and environmental commitments that will be implemented during the construction phase of the Project. Reinstatement will aim to provide habitats of equal or better value to those affected and permanent land take will be compensated. As set out in the Biodiversity Net Gain Report (document reference 7.1) National Grid is committed to deliver a minimum of 10% Biodiversity Net Gain. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once re-established. Discussions are currently taking place between National Grid and the Waveney and Little Ouse Recovery (WaLOR) scheme (Suffolk Wildlife Trust, 2025), a landscape recovery scheme which is located in the same geographic area as the Project. This project is seeking to deliver a number of BNG units in addition to the delivery of the WaLOR scheme and National Grid have discussed the opportunity to deliver approximately 600 area habitat units. This could comprise a mixture of woodland, other neutral grassland as well as the potential to

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			deliver wetland mosaic habitats. The final mix of units and location will be explored as the WaLOR scheme develops. Suffolk Wildlife Trust have also identified Market Weston Fen a habitat bank in Suffolk that comprises mixed scrub and other neutral grassland. National Grid is currently in discussion with both parties to sign an Expression of Interest and updated details will be provided accordingly.
	Policy 15 – Local Green Space	The areas shown in Maps 21 to 27 are designated as Local Green Space for special protection. These will be protected from inappropriate development in accordance with Green Belt Policy, except for the following deviations: New buildings are inappropriate development, with the only exceptions to this: a) Buildings for forestry or agriculture where the Local Green Space is used for commercial woodland or farmland; b) The provision of appropriate facilities in connection with the existing use of land where the facilities preserve the openness of the Local Green Space and do not conflict with the reasons for designation that make it special to the community, such as for recreation or ecology; c) The extension or alteration of a building if it does not impact on the openness or the reasons for designation that make Local Green Space special to the community; or	Noted: The Project avoids any direct interaction with the Local Green Spaces identified in Roydon and Palgrave.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		d) The replacement of a building provided the new building is in the same use and not materially larger than the one it replaces. Other appropriate development includes: e) Engineering operations that are temporary, small-scale and result in full restoration; f) The re-use of buildings provided that the buildings are of permanent and substantial construction; or g) Material changes in the use of land where it would not undermine the reasons for designation that make it special to the community.	
	Policy 16 – Protection of Key Views	The views identified in Maps 29 to 35 and described in the DDNP Key Views Assessment Report are important public local views in the Diss and District area. Development proposals should demonstrate that they are sited and designed to be of a form and scale that avoids or mitigates unacceptable harm to the identified key views. Development proposals that would unacceptably harm the identified key views will not be supported.	ES Chapter 13: Landscape and Visual (document reference 6.13) presents the assessment of the likely significant landscape and visual effects that could result from the Project. Within the Diss and District Neighbourhood Plan area, the relevant viewpoints for the Project are VP1.13, VP1.15, VP1.22, VP1.21, VP2.03 and VP2.22. Visual receptors are grouped into Visual Receptor Areas (VRAs) based on location, landscape characteristics, and similar views, as shown in ES Figure 13.7: Visual Receptors and Viewpoints (document reference 6.13.F7). VRAs and representative viewpoints were identified through site surveys, desktop analysis, and Neighbourhood Plans. Visual effects of linear developments, like overhead

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			lines, are assessed using representative viewpoints to capture typical views, following GLVIA3 guidelines for a proportionate and focused LVIA. Whilst important views have been considered, individual assessments from each identified location have not been presented in the LVIA. The Visual Receptor Area assessment contained in the Visual Baseline and Assessment (document reference 6.13.A3) concludes for VRA A3 Mulbarton and Wreningham that the magnitude and level of effect during construction would be: • Within 0.5 km the scale of change would be large within 0.5 km and the magnitude of effect would be high. The effect would be major and significant (adverse) • Between 0.5 km and 1.5 km the scale of change would be medium and the magnitude of effect would be medium. The effect would be moderate and significant (adverse) • Beyond 1.5 km the scale of change would be small and the magnitude of effect would be low. The effect would be minor and not significant (adverse) • In operation (year 1 and year 15) within 0.5 km the effect would be major and significant (adverse). Between 0.5 km to 1.5 km the effect would be Moderate

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			and significant (adverse), reducing to minor and not significant (adverse) within Mulbarton.
	Policy 17 – Non-Designated Heritage Assets	The character, integrity and appearance of existing historic assets will be protected and where possible enhanced. The Non-Designated Heritage Assets listed on Maps 36 to 41 have considerable local significance. Development proposals should avoid harm to these heritage assets and have regard to their character, important features, setting and relationship with surrounding buildings or uses. Any development proposals that affect these assets or their setting will need to demonstrate that they do not harm, or have minimised harm, to the significance of the asset, and should make clear the public benefits that the proposal would deliver so that any harm to the asset's significance or setting can be weighed against the benefits. Any planning or listed building consent application for works to a non-designated heritage asset should be supported by a Heritage Statement. This will describe the significance of the asset, the works being proposed and why, and how the significance of the asset will be affected by those proposals, along with any mitigation measures. Proposals for works to or adjacent to Non-Designated Heritage Assets should demonstrate that consideration has been given to preserving: • The heritage asset and its distinctive historic features; • The positive elements of its setting that contribute to the asset's historic significance;	ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. Within the Diss and District Neighbourhood Plan Area significant adverse effects have been identified at the Grade II Listed Roydon Hall and Grade II Listed. The Gables for example This harm is necessary to achieve the substantial public benefit of

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• The contribution that the asset and its setting makes to the character of the local area.	delivering CNP infrastructure that outweighs the heritage impact. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.
Croxton, Brettenham and Kilverstone Neighbourhood Plan (24 January 2019)	Policy JNP7 Transport and Highways Safety	Subject to other policies in this Plan development proposals will be supported which include: • New footpaths which form part of a coherent network and provide attractive pedestrian accessibility; and/or. • Other proposals which would include measures to improve levels of walking and cycling in the neighbourhood area Development proposals should include a statement as part of the application which sets out and demonstrates how the new development will either not add significantly to increased traffic flows or risk to highway safety, or how any increase will be minimised, and any adverse effects mitigated to ensure that no parish roads become “rat-runs”. Footpaths should also be designed to avoid increasing access and recreation to protected sites in order to avoid adverse impacts on the protected sites or the features for which they are designated. Where recreational impacts are likely to have a negative impact, the footpaths and	In consultation with Norfolk County Council an alternative primary access route for construction vehicles along the A1066 to the A11 west of Thetford has been assessed within the Transport Assessment (document reference 7.11) to reduce the impact of the construction route through Diss The Project will have no impact on public rights of way within the Neighbourhood Plan area.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		access points should be managed to minimise these impacts.	
Section B			
Diss and District (28th September 2023)	Refer to Section A		
Botesdale & Rickinghall (23 January 2020)	Policy B&R 11 – Area of Local Landscape Sensitivity	Development proposals in the Area of Local Landscape Sensitivity, as identified on the Policies Map, will be permitted only where they: • protect or enhance the special landscape qualities of the area identified in the Landscape Appraisal: and • are designed and sited so as to harmonise with the landscape setting	The Project is not proposing any works within the Area of Local Landscape Sensitivity identified in the Botesdale and Rickinghall Neighbourhood Plan. The works proposed within the Neighbourhood Plan area are limited to highway works at Finningham Road (B1113) / Candle Street and the provision of a temporary highway laydown area.
	Policy B&R 12 – Local Green Spaces	The following Local Green Spaces are designated in this Plan and identified on the Policies Map. Development on these sites will only be permitted in very special circumstances, permitted development rights, including the operational requirements of infrastructure providers, are not affected by this designation.	The Project does not impact on the Local Green Spaces identified at Candle Street and around St. Mary's Church (as identified on the Babergh and Mid Suffolk Local Plan. As there is no overlap between the Order Limits and areas of Green Space, there is no requirement for a local green space assessment.
	Policy B&R 14 – Protection of Heritage Assets	To ensure the conservation and enhancement of the villages' heritage assets, proposals must: • Preserve or enhance the significance of the heritage assets of the villages, their setting and the wider built environment, including views into, within and out of the conservation area as identified on the Policies Map;	National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• Retain buildings and spaces, the loss of which would cause harm to the character or appearance of the conservation area; • Contribute to the villages local distinctiveness, built form and scale of its heritage assets, as described in the Landscape Character Appraisal, Built Environment Character Appraisal and the Botesdale and Rickinghall Conservation Area Appraisal, through the use of appropriate design and materials; • Be of an appropriate scale, form, height, massing, alignment and detailed design which respects the area's character, appearance and its setting. • Demonstrate a clear understanding of the significance of the asset and the wider context in which the heritage asset sits, alongside an assessment of the potential impact of the development on the heritage asset and its context; and • Provide clear justification, through the submission of a heritage statement, for any works that would lead to harm to a heritage asset yet to be of wider substantial public benefit. Proposals will not be supported where the harm caused as a result of the impact of a proposed scheme is not justified by the public benefits that would be provided. Where a planning proposal affects a heritage asset it must be accompanied by a Heritage Statement identifying, as a minimum, the	considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. The works proposed within the Neighbourhood Plan area are limited to highway works at Finningham Road (B1113) / Candle Street and the provision of a temporary highway laydown area. The Historic Environment Baseline Report (document reference 6.11.A1) notes that due the overall distance to the Order Limits pylon corridor and the interruption caused by the A142 bypass, the setting of the Botesdale Conservation Area and the listed buildings within does not extend to the Order Limits. As such the Botesdale Conservation Area was scoped out of the Environmental Assessment.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		significance of the asset, the development proposal and an assessment of the impact of the proposal on heritage assets. The level of detail of the heritage statement should be proportionate to the importance of the asset, the works proposed and sufficient to understand the potential impact of the proposal on its significance and/or setting.	
	Policy B&R 21 – Public Rights of Way	Development which would adversely affect the character or result in the loss of existing or proposed rights of way, will not be permitted unless alternative provision or diversions can be arranged which are at least as attractive, safe and convenient for public use. Improvements and additions to such rights of way shall be delivered as an integral part of new development to enable new or improved links to be created within the settlement, between settlements and/or providing access to the countryside or green infrastructure sites as appropriate.	The Outline Public Rights of Way Management Plan details the proposed management strategy for Public Rights of Way (PRoW) interactions on the Project. No public rights of way within the Botesdale & Rickinghall Neighbourhood Plan Area will be affected by the Project.
Mendlesham (24 November 2022)	Policy MP5 - Historic Environment	Any designated heritage assets in the Parish and their settings, will be conserved and enhanced for their historic significance and their importance with particular regard to their local distinctiveness, character and sense of place. A detailed proposal should be put forward for all new developments (with 10 or more dwellings) identifying any potential increases in traffic levels and what mitigating measures will be put in place to minimise any adverse effects. Any proposal for development requiring planning permission which would generate additional traffic needing to access the Conservation Area must provide a transport assessment giving expected	ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the likely significant cultural heritage effects that could result from the Project. ES Appendix 11.2: Historic Environment Assessment Tables (document reference 6.11.A2) includes an assessment of the impacts on listed buildings, including the Grade II Listed Building Mendlesham Hall and the Green Farmhouse during the construction and operational phase. National Grid has undertaken an iterative design process which responds to policy

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		traffic volumes emanating from the proposed development and include any necessary mitigation measures to minimise any adverse effects. Any new housing or business development that is within the Conservation Area or the setting of any designated heritage asset will be supported provided it does not have an adverse impact upon the significance of the heritage asset. All new development should demonstrate a clear understanding of the rural context of Mendlesham and the importance of maintaining its village environment. Developments will provide appropriate levels of landscaping, boundary and screening planting to ensure that they blend in with the existing environment. Supporting Document SD19 (“Landscape and Visual Assessment of Mendlesham”) provides examples of the important features of the village that need to be maintained.	requirements, published historic landscape character assessments and fieldwork analysis, to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. This harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. With regard to an increase in traffic movements, the Project has not identified the Mendlesham Conservation Area as a Primary Access Route for construction traffic.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
	Policy MP9 – Local Green Spaces	The following Local Green Spaces are designated in this Plan and are identified on the Proposals Maps (ref: Section 2 of this document, Figures 2.2 and 2.3 and also in Figures 6.1 to 6.6 and 6.8 to 6.10. • Playing fields at Mendlesham village, • Children's play area at Mendlesham village, • Church graveyards at St. Mary's, Mendlesham, • The Mendlesham Millennium Wood, • Allotments at Mendlesham Green, • Baptist Chapel (ex) cemetery at Mendlesham Green, • Children's play area at Mendlesham Green, • Green area at Mayfield Way, • Green area at Horsefair Close, • Green area at Glebe Way.	An assessment of the impact of the Project on Open Spaces is included in the Planning Statement (document reference 5.6). The Project has no direct interaction with any of the Green Spaces identified in the Mendlesham Neighbourhood Plan.
	Policy MP10 – Open Spaces	Within or abutting settlement boundaries, visually important open spaces will be protected because of their contribution to the character or appearance of their surroundings and their amenity value to the local community. Where appropriate, development proposals must address the effect they will have on any local identified visually important open spaces and any effect on views of the Conservation Area and demonstrate that they will not significantly affect the views of these spaces. (The Proposal Maps Figures 2.2 and 2.3 and also Figure 6.7 - Principal views in and around Mendlesham refers).	ES Chapter 13: Landscape and Visual (document reference 6.13) presents the assessment of likely significant landscape and visual effects that could result from the Project. To inform the assessment a number of viewpoints have been identified along the route of the Project. Within the Mendlesham Neighbourhood Plan area, the relevant viewpoints for the Project are VP2.34, VP2.24, VP2.11, VP2.35, VP2.41 and VP2.10. Visual receptors are grouped into Visual Receptor Areas (VRAs) based on location, landscape characteristics, and similar

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		Those visually important open spaces that are also identified as Local Green Spaces in this Plan have an additional level of protection under Policy MP9.	views, as shown in ES Figure 13.7: Visual Receptors and Viewpoints (document reference 6.13.F7). VRAs and representative viewpoints were identified through site surveys, desktop analysis, and Neighbourhood Plans. Visual effects of linear developments, like overhead lines, are assessed using representative viewpoints to capture typical views, following GLVIA3 guidelines for a proportionate and focused LVIA. Whilst important views have been considered, individual assessments from each identified location have not been presented in the LVIA.
	Policy MP11 – Paths and bridleways	New housing and business developments shall, where possible, encourage usage of, and provide linkage to, the network of existing paths and bridleways in and around Mendlesham. Development proposals for new housing and business developments shall, where possible, demonstrate that they have maximised opportunities to promote safe walking, cycling, access to community services and the countryside via Public Rights of Way. Any proposed diversion of a Public Right of Way within a development site should not result in an adverse impact on residential amenity or the safety of the general public.	With regard to the second part of Policy MP11. Within the Mendlesham Neighbourhood Plan Area, the Project interacts with a number of Public Rights of Way. Details of the strategy for PRoWs and the management regimes can be found within the Outline PRoW Management Plan (document reference 7.6). The following PRoW within Mendlesham are identified as being subject to management (e.g. temporary closure and diversion or temporary closure (managed)) of between 1 day and the duration of works: • W-392/035/0 • W-392/041/0 • W-392/046/0

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			• W392/-059/0 (part of the Wimble Way)
Stowupland (27 June 2019)	SNP8 – Landscape Character – Green Gaps, Views and Features	Development proposals will be supported where: they do not have a significant detrimental impact on the rural setting of the village and the visual qualities of the upland landscape are protected; i. the separate identity of Stowupland as a village is retained and coalescence with Stowmarket is prevented; ii. the separate character of the main village and Saxham Street is maintained and coalescence between the two areas is prevented; iii. the plateau-edge open character of the parish (characterised by the open spaces, wide verges, trees and hedgerows and key views out from points identified on Map 9 and the Proposals Map) are maintained; and iv. they improve landscape condition, visual amenity, or the setting of valued features, and settings where existing development has adverse effects. The Green Gaps and key views to the wider landscape at the points identified on Map 9 and the Proposals Map are of particular importance in protecting the rural setting and maintaining the distinctive local character and qualities of the parish.	ES Chapter 13: Landscape and Visual (document reference 6.13) presents the assessment of likely significant landscape and visual effects that could result from the Project. To inform the assessment a number of viewpoints have been identified along the route of the Project. Within the Stowupland Neighbourhood Plan area, the relevant viewpoints for the Project are VP2.12, VP2.13 and VP2.36. Visual receptors are grouped into Visual Receptor Areas (VRAs) based on location, landscape characteristics, and similar views, as shown in ES Figure 13.7: Visual Receptors and Viewpoints (document reference 6.13.F7). VRAs and representative viewpoints were identified through site surveys, desktop analysis, and Neighbourhood Plans. Visual effects of linear developments, like overhead lines, are assessed using representative viewpoints to capture typical views, following GLVIA3 guidelines for a proportionate and focused LVIA. Whilst important views have been considered, individual assessments from each identified location have not been presented in the LVIA. National Grid has noted the location of the Green Gaps within the Stowupland Neighbourhood Plan. The Project avoids any direct interaction with these areas.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
	SNP9 – Protecting Best and Most Versatile Agricultural Land	To protect opportunities for food production and the continuance of the agricultural economy, proposals for development on sites of 1 hectare or more on the best and most versatile agricultural land will not usually be supported unless it can be satisfactorily demonstrated that land of a poorer quality is not available.	ES Figure 6.2: Provisional Agricultural Land Classification Mapping (page 8 of 24) (document reference 6.6.F2) illustrates that the Project is routed on Grade 3 agricultural land. ES Chapter 6: Agriculture and Soils (document reference 6.6) identifies that during operation (and maintenance), there would be a permanent loss of areas of agricultural land any land required for permanent infrastructure. However, it will be possible to continue to farm under the conductors minimising the loss of best and most versatile agricultural land.
	SNP10 – Protecting the Natural Environment and Biodiversity – Strengthening Green/ Blue Infrastructure	All proposals for development will be expected to retain features of biodiversity value, especially ponds, ditches, streams, trees and hedgerows, and green verges/margins. Where loss or damage is unavoidable e.g. where a new access is created, the development shall provide for appropriate replacement planting using native species together with a method statement for ongoing care and maintenance of that new / replacement planting, and new green or blue infrastructure features as appropriate. The creation of ponds, attenuation features, landscape planting and related management plan/method statements should reflect the characteristics of the locality and use indigenous species only. Where opportunities exist, new development must link with existing features to provide and promote ecological areas and restore	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) assesses the potential impacts of the Project's construction, operation, and maintenance phases on ecological and biodiversity receptors. Habitat connectivity will be preserved where possible by utilising existing access routes, minimising working widths through biodiversity receptors, and maintaining connectivity via green corridors such as hedgerows and watercourses. National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits The Outline LEMP (document reference 7.4) refers to the retention, replacement planting and onsite habitat creation and enhancement of

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		wildlife “corridors” and shall involve creating new / additional wildlife habitats.	habitats in line with the BNG Report (document reference 7.1). The Outline Code of Construction Practice (CoCP) (document reference 7.2) contains relevant measures relating to Ecology and Biodiversity which demonstrate examples of where the Project will seek to identify opportunities for enhancement. These measures include but are not limited to: • B12: Where temporary habitat removal is required to facilitate construction, this will be reinstated. Reinstatement will aim to provide habitats of equal or better value to those affected and permanent land take will be mitigated with additional habitat creation/ enhancement; minimum of 10 % BNG is being sought. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once re-established • B201: The Project will seek to provide strategic habitat enhancement and creation, aiming to identify and implement opportunities to improve habitat quality and connectivity and align with national nature recovery objectives and projects. Such measures may include specific habitat

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			creation and enhancement measures and additional receptor -specific measures such as the creation of habitat piles and installation of bird and bat boxes.
	SNP11 – Playing Fields	The school and parish playing fields identified on the Proposals Map are designated for sport and recreation use. This land and the land and buildings associated with it shall not be built on unless the criteria set out in NPPF paragraph 97 are complied with in full, and the location of any alternative provision is centrally located and accessible to all.	An assessment of the impact of the Project on open spaces (including playing fields) is included in the Planning Statement (document reference 5.6). The Project has taken a precautionary approach to the identification of potential open space. The Project has no direct interaction with any of the school and parish playing fields identified on the Proposals Map of Stowupland Neighbourhood Plan.
	SNP12 – Local Green Spaces	Local Green Spaces are designated at the village green and an area of land to the east of the village known as the meadow (or Thradstones Meadow) as shown on the Proposals Map. Local Green Spaces shall not be built on or developed for other uses unless very special circumstances are demonstrated. Development proposals adjacent to and/or affecting the historic setting, visual qualities, biodiversity and character of Local Green Spaces must demonstrate how the distinctive and valued qualities of the LGS have been considered and should respond positively to the character and context of the LGS to preserve and enhance the quality of the LGS and its setting.	An assessment of the impact of the Project on open spaces (including playing fields) is included in the Planning Statement (document reference 5.6). The Project has taken a precautionary approach to the identification of potential open space. The Project has no direct interaction with any of the Green Spaces identified in the Stowupland Neighbourhood Plan.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
	SNP13 – Public Rights of Way	Existing Public Rights of Way in the parish will be protected. Where rerouting is essential to accommodate sustainable development any loss of amenity value will be minimised and mitigation measure will be taken to ensure that the network is not adversely affected or reduced. Opportunities will be sought to enhance the network of Public Rights of Way through the creation of new links, improved maintenance and waymarking, and making use of developer contributions, agricultural schemes and local partnership initiatives.	Details of the strategy for PRoWs and the management regimes can be found within the Outline PRoW Management Plan (document reference 7.6). The following PRoW within Mendlesham are identified as being subject to management (e.g. temporary closure and diversion or temporary closure (managed)) of between 1 day and the duration of works: • W-499/007/0 • W-499/008/0 • W-499/010/0 • W-499/015/0
East Bergholt (20 September 2016)	Policy EB6 Landscape and Views	Development proposals shall demonstrate that they: 1. Comply with the policies and guidance relating to the Dedham Vale AONB and its setting; 2. Where appropriate, satisfy the development tests set out in paragraph 116 of the National Planning Policy Framework; 3. Respond positively to the special qualities and scenic beauty of the Dedham Vale AONB and its setting; 4. Have taken full account of the capacity assessment set out in the Landscape Sensitivity and Capacity Assessment (Map 11); and 5. Would not have an unacceptable adverse impact on the landscape setting of the village demonstrated through a Landscape and Visual Impact Assessment	ES Chapter 13: Landscape and Visual (document reference 6.13) presents the assessment of likely significant landscape and visual effects that could result from the Project. To inform the assessment a number of viewpoints have been identified along the route of the Project. The East Bergholt Neighbourhood Plan identifies important views within this area, including from the edge of East Bergholt and from the local lanes to the north of the village. Within the East Bergholt Neighbourhood Plan area, the relevant viewpoints for the Project include VP3.17 and VP3.30. Visual receptors are grouped into Visual Receptor Areas (VRAs) based on location, landscape characteristics, and similar views, as shown in ES Figure 13.7: Visual

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			Receptors and Viewpoints (document reference 6.13.F7). VRAs and representative viewpoints were identified through site surveys, desktop analysis, and Neighbourhood Plans. Visual effects of linear developments, like overhead lines, are assessed using representative viewpoints to capture typical views, following GLVIA3 guidelines for a proportionate and focused LVIA. Whilst important views have been considered, individual assessments from each identified location have not been presented in the LVIA. With regard to responding positively to the Denham Vale National Landscape, ES Chapter 3: Alternatives (document reference 6.3) describes the routeing decision made by National Grid to route directly through the Dedham Vale National Landscape (using underground cables) or take a longer route around it. In defining the Project routeing at the Strategic Options Stage the assessment focused on whether the Bramford to EACN Substation connection should route directly through the Dedham Vale National Landscape (using underground cables within the National Landscape) or take a longer route around it via the Twinstead Tee area. Routes avoiding the National Landscape by passing north of Colchester presented

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			significant additional challenges, including greater technical complexity with multiple constrained sections at Layham, Boxford, and Lamarsh Lane, increased construction complexity, and the need for additional crossings of existing infrastructure such as the proposed Bramford to Twinstead overhead lines. Moreover, routes north of Colchester may still result in adverse effects on the setting of the National Landscape. The direct route with underground cables was selected as it halves the connection length, avoids creating a third connection between Bramford and Twinstead, and better complies with the Holford Rules, despite requiring underground cable mitigation through the National Landscape.
	Policy EB7 Local Green Space	Those areas defined in Map 13 (Shown in more detail in Maps 14, 15, 16 and 17) shall be protected as Local Green Space. Development that would result in the loss of, or adversely affect the function or appearance of, a Local Green Space will only be permitted in very special circumstances. Of special importance are open spaces within the village which have recreational and amenity value and reduce recreational pressure on the Stour & Orwell Estuaries Special Protection Areas.	An assessment of the impact of the Project on Open Spaces is included in the Planning Statement (document reference 5.6). The Project has no direct interaction with any of the Local Green Spaces identified in Maps 13 (14, 15, 16 and 17) in the East Bergholt Neighbourhood Plan.
	Policy EB8 Biodiversity	Proposals for development should protect and enhance biodiversity and geodiversity to reflect the requirements of paragraphs 109, 117 and 118	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) assesses the potential impacts of the Project's

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		of the National Planning Policy Framework and comply with all the following criteria: 1. Protecting and enhancing internationally, nationally and locally designated sites, protected species and ancient or species-rich hedgerows, grasslands and woodlands; 2. Preserving ecological networks, and the migration or transit of flora and fauna; 3. Protecting ancient trees or trees of arboricultural value; 4. Promoting the preservation, restoration and re-creation of wildlife priority habitats and the protection and recovery of priority species; 5. Providing a net gain in biodiversity; 6. Avoiding potential impacts on the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site. Proposals should demonstrate that ecological considerations have been properly assessed in relation to the application site and those adjacent to it where appropriate. Where necessary appropriate mitigation measures should be carried out. Where adverse impacts on biodiversity cannot be avoided, necessary appropriate mitigation measures or, as a last resort, compensation measures will be carried out as described in paragraph 118 of the National Planning Policy Framework; and 7. In line with paragraph 118 of the National Planning Policy Framework, biodiversity features should be incorporated in and around	construction, operation, and maintenance phases on ecological and biodiversity receptors. Habitat connectivity will be preserved where possible by utilising existing access routes, minimising working widths through biodiversity receptors, and maintaining connectivity via green corridors such as hedgerows and watercourses. National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits The Outline LEMP (document reference 7.4) refers to the retention, replacement planting and onsite habitat creation and enhancement of habitats in line with the BNG Report (document reference 7.1). The Outline Code of Construction Practice (CoCP) (document reference 7.2) contains relevant measures relating to Ecology and Biodiversity which demonstrate examples of where the Project will seek to identify opportunities for enhancement. These measures include but are not limited to: • B12: Where temporary habitat removal is required to facilitate construction, this will be reinstated. Reinstatement will aim to provide habitats of equal or better value to those affected and permanent land take will be mitigated with additional habitat creation/ enhancement; minimum of 10 % BNG is being sought. Accordingly,

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		New developments and biodiversity enhancements added wherever possible.	hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once re-established • B201: The Project will seek to provide strategic habitat enhancement and creation, aiming to identify and implement opportunities to improve habitat quality and connectivity and align with national nature recovery objectives and projects. Such measures may include specific habitat creation and enhancement measures and additional receptor -specific measures such as the creation of habitat piles and installation of bird and bat boxes.
Section C			
Sproughton (28 November 2023)	Policy SPTN 7 – Area of Local Landscape Sensitivity and Other Valued Landscapes	Development proposals in the Area of Local Landscape Sensitivity as identified on the Policies Map, or in valued landscapes, will be permitted only where they: • protect and enhance the special landscape qualities of the area • are designed and sited so as to harmonise with the landscape setting of the site; and • provide landscape impact mitigation measures as part of the proposal where necessary	Noted. The Project is not proposing any works within the Area of Local Landscape Sensitivity as identified on Map 5 and the Proposals Map of the Sproughton Neighbourhood Plan. The works in closest proximity to the Area of Local Landscape Sensitivity involves the removal of existing third party 132 kV overhead line.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
	Policy SPTN 8 - Protection of Important Views	To conserve the landscape and rural character and setting of the Neighbourhood Plan Area, development proposals shall, where appropriate, demonstrate how they will ensure that there is no detrimental impact on the key features and attributes of important views identified on Map 6 and the Policies Maps. Proposals for new buildings outside the Settlement Boundaries should be accompanied by a Landscape Visual Impact Appraisal that demonstrates how the proposal: • can be accommodated in the countryside without having a detrimental impact, by reason of the building's scale, materials and location, on the character and appearance of the countryside and its distinction from the built-up area • conserves and enhances the unique landscape and scenic beauty within the parish, having regard to the types of valued views identified and described in the Neighborhood Plan Landscape Appraisal • protects the key features of the important views.	ES Chapter 13: Landscape and Visual (document reference 6.13) presents the assessment of likely significant landscape and visual effects that could result from the Project. To inform the assessment a number of viewpoints have been identified along the route of the Project. Within the Sproughton Market Neighbourhood Plan area, the relevant viewpoints for the Project are VP3.29 and VP3.22. Visual receptors are grouped into Visual Receptor Areas (VRAs) based on location, landscape characteristics, and similar views, as shown in ES Figure 13.7: Visual Receptors and Viewpoints (document reference 6.13.F7). VRAs and representative viewpoints were identified through site surveys, desktop analysis, and Neighbourhood Plans. Visual effects of linear developments, like overhead lines, are assessed using representative viewpoints to capture typical views, following GLVIA3 guidelines for a proportionate and focused LVIA. Whilst important views have been considered, individual assessments from each identified location have not been presented in the LVIA. The Visual Receptor Area assessment contained in the Visual Baseline and Assessment (document reference 6.13.A3) concludes for VRA C2

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			Washbrook that the magnitude and level of effect during construction would be: • Within 0.5 km the scale of change would be large within 0.5 km and the magnitude of effect would be high. The effect would be major and significant (adverse) • Between 0.5 km and 1.5 km the scale of change would be medium, reducing to barely perceptible from Abbey Oaks. The magnitude of effect would be medium, reducing to barely perceptible. The effect would be moderate and significant (adverse), reducing to negligible and not significant from Abbey Oaks Beyond 1.5 km there would be no magnitude of effect and no effect (not significant). In operation (year 1 and year 15) within 0.5 km the effect would be Moderate and significant (adverse), reducing to negligible and not significant from Abbey Oaks and from Grindle Lane (Quiet Lane).. Between 0.5 km to 1.5 km the effect would be Moderate and significant (adverse), reducing to negligible and not significant from Abbey Oaks and from Grindle Lane (Quiet Lane).
	Policy SPTN 9 - Local Green Spaces	The following Local Green Spaces are designated in this Plan and identified on the Policies Map:	An assessment of the impact of the Project on local green spaces is included

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		1) Millennium Green, 2) Parish Square, 3) Sproughton Court 4) Glebe Close 5) Gipping Way 6) Gorse Field Close and Ladder Field, Church Lane 7) Oak triangle by Manor Lodge, Lower Street 8) Allotments, Burstall Lane 9) Ransome Close 10) Church of All Saints - Cemetery / Churchyard, 11) Monks Gate, 12) Land adjoining The Shed, High Street/Lower Street, 13) Chantry Cut Island, 14) The Grove Wood, East of High Street, 15) Oak Pit, Church Lane. Development in the Local Green Spaces will be consistent with national policy for Green Belts.	in the Planning Statement (document reference 5.6). The Project has taken a precautionary approach to the identification of potential open space. The Project has no direct interaction with any of the 15 Local Green Spaces identified in the Sproughton Neighbourhood Plan.
	Policy SPTN 10 - Biodiversity Protection and Enhancement	Development proposals should avoid the loss of, or material harm to, trees, hedgerows and other natural features such as ponds. Proposals that contribute to the delivery of the Green Infrastructure Projects will be supported. Where such losses or harm are unavoidable, adequate mitigation measures or, as a last resort, compensation measures will be sought. If suitable mitigation or compensation measures cannot be provided, then planning permission should be refused. Where new access is created, or an existing access is widened through an existing hedgerow, a new hedgerow of native species shall be planted on the splay returns into the site to maintain the appearance and continuity of hedgerows in the vicinity. • Otherwise, acceptable proposals must achieve a minimum of 10% biodiversity measurable net gain over the pre-development biodiversity value as measured by the Natural England	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) assesses the potential impacts of the Project's construction, operation, and maintenance phases on ecological and biodiversity receptors. Habitat connectivity will be preserved where possible by utilising existing access routes, minimising working widths through biodiversity receptors, and maintaining connectivity via green corridors such as hedgerows and watercourses. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on biodiversity assets. This Biodiversity Net Gain (BNG) Report (document reference 7.1) has been prepared to support the Project following

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		Biodiversity Metric (3.0) or later or agreed equivalent. Biodiversity improvement should, where possible, form an integral part of the design of any proposal, for example through: • the creation of new natural habitats including ponds • the planting of additional trees and hedgerows (reflecting the character of Sproughton's traditional hedgerows) • restoring and repairing fragmented biodiversity networks through, for example, including holes in fences which allow access for hedgehogs • the incorporation of bee bricks and swift, owl and bat boxes into buildings. • Where biodiversity assets cannot be retained or enhanced on site, 'biodiversity offsetting' to deliver a net gain offsite will be supported where the approach is in accordance with any relevant national or locally adopted protocols. • Contributions to off-site mitigation in respect to Policy SPTN 11 will be additional to the biodiversity net gain requirements of this policy.	National Grid's commitment to deliver at least a 10% Biodiversity Net Gain. In addition to the above, the Outline Code of Construction Practice (CoCP) (document reference 7.2) contains relevant measures relating to Ecology and Biodiversity which demonstrate examples of where the Project will seek to identify opportunities for enhancement. These measures include but are not limited to: • B12: Where temporary habitat removal is required to facilitate construction, this will be reinstated. Reinstatement will aim to provide habitats of equal or better value to those affected and permanent land take will be mitigated with additional habitat creation/ enhancement; minimum of 10 % BNG is being sought. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once re-established • B201: The Project will seek to provide strategic habitat enhancement and creation, aiming to identify and implement opportunities to improve habitat quality and connectivity and align with national nature recovery objectives and projects. Such

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			measures may include specific habitat creation and enhancement measures and additional receptor -specific measures such as the creation of habitat piles and installation of bird and bat boxes.
	Policy SPTN 12 – Heritage Assets	To conserve or enhance the parish designated heritage assets proposals should: • conserve or enhance the significance of the designated heritage assets of the parish including, where appropriate their setting and the wider built environment • retain buildings and spaces, the loss of which would cause harm to the character or appearance of the parish including areas of distinctive character • contribute to the parish's local distinctiveness, built form and scale of its heritage assets, through the use of appropriate design and materials • be of an appropriate scale, form, height, massing, alignment and detailed design which respects the area's character, appearance and setting, in line with the AECOM Design Guidance and Codes for Sproughton • demonstrate a clear understanding of the significance of the asset and the wider context in which the heritage asset sits, alongside an assessment of the potential impact of the development on the heritage asset and its context	The Project is routed outside any of the designated heritage assets in and around Sproughton. ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• provide clear and convincing justification, through the submission of a proportionate heritage statement, for any works that would lead to harm to a heritage asset and where this would be less than substantial harm, weigh this against the public benefits of the proposal and in the case of substantial harm, show that this is necessary to achieve substantial public benefits that outweigh that harm. Where a planning proposal affects a heritage asset, it must be accompanied by a Heritage Statement identifying, as a minimum, the significance of the asset, and an assessment of the impact of the proposal on the heritage asset. The level of detail of the Heritage Statement should be proportionate to the importance of the asset, the works proposed and sufficient to understand the potential impact of the proposal on its significance and/or setting.	
	Policy SPTN 13 – Non-Designated Heritage Assets	This policy designates the following buildings and features as non-designated heritage assets. These are identified on the Policies Map and in the separate appraisal document. The retention and enhancement of the following buildings and features will be secured. 1.Manor Lodge 2. Hall Field Cottage 3 Almshouses 4. Village Lock Up 5. Cage Cottage 6. 5 Lower Street 7. 3 Lower Street 8. 1 Lower Street 9. Peppermint House 10. Reading Room 11. Reading Room Cottage 12. Rectory Cottage 13. Church Hall 14. The Old Police House 15. The Shed 16. The Old Coach House 17. Old Stables 18. Chantry Row 19. Rivers Court 20 Abbey Oaks	ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		Gate House and Abbey Oaks 21. The Old Lodge 22. Chestnut House 23. Laundry House 24. Old School House 25. Valley View 26. Park View 27. 1 Lower Chantry Cottage 28. Chantry Gate 29. Balitore 30. Pinetrees 31. Beech Lawn 32. Elton Park Cottage 33. Hazeldell 34. Manderley Manor 35. Sproughton Park (Villa farm) 36. Pillbox. Proposals for any works that would cause harm to a building or feature of local significance must be supported by an appropriate analysis of the significance of the asset to enable a balanced judgment to be made having regard to the scale of any harm or loss and the significance of the heritage asset.	potentially significant adverse effects on cultural heritage and archaeological assets. The Sproughton Park (Villa Farm) Farmstead is situated 50 m north-east of the Order Limits, between Hintlesham Park and Chantry Park. This farmstead is from the 19th century and is of a regular plan formed by its agricultural buildings and with a farmhouse set away from the main yard. There has been significant loss of the traditional farm buildings since its construction. The Historic Environment Baseline Report (document reference 6.11.A1) notes that this asset holds evidential value.
	Policy SPTN 14 - Sproughton Special Character Area	A Special Character Area is identified on the Policies Map. Within this area, proposals will only be supported where they preserve or enhance the distinct characteristics of the existing buildings and features and their setting, as identified in the Special Character Area Appraisal.	The Sproughton Special Character Area includes an area of land to the east and west of the River Gipping and north and south of Lower Street, Sproughton. The Project is remote from this Special Character Ares and avoid and direct interaction.
	Policy SPTN 16 - Flooding and Sustainable Drainage	Proposals for all new development will be required to assess levels of flood risk (existing and future) and ensure they manage surface water from the proposed development, having regard to the Suffolk County Council SuDS guidance and any guidance produced by Babergh District Council in terms of Supplementary Planning Guidance detailing how on-site drainage and water resources will be managed so as not to cause or	The Project over sails the Belstead Brook. ES Figure 12.2: Flood Risk Areas (document reference 6.12.F2) illustrates the extent of flooding associated with this watercourse. No permanent works are proposed within the flood plain associated with Belstead Brook. ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) outlines the standard and additional mitigation

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		exacerbate surface water and fluvial flooding elsewhere. Proposals should, as appropriate, include the use of above-ground open Sustainable Drainage Systems (SuDS). These could include: • wetland and other water features, which can help reduce flood risk whilst offering other benefits including water quality, amenity/ recreational areas, and biodiversity benefits • rainwater and stormwater harvesting and recycling • other natural drainage systems where easily accessible maintenance can be achieved	measures relevant to hydrology, land drainage, and flood risk. These measures will be secured through the Outline CoCP (document reference 7.2). The Outline CoCP (document reference 7.2) will be secured via a Requirement in the Development Consent Order (DCO), which mandates that the Main Works Contractor(s) prepare the CoCP substantially in accordance with the Outline CoCP to satisfy the Requirement.
	Policy SPTN 18 – Open Space, Sport and Recreation Facilities	Proposals for the provision, enhancement and/or expansion of amenity, sport or recreation open space or facilities will be permitted subject to compliance with other Policies in the Development Plan. Development which will result in the loss of existing amenity, sport or recreation open space or facilities will not be allowed unless: • it can be demonstrated that the space or facility is surplus to requirement against the local planning authority's standards for that location, and the proposed loss will not result in a shortfall during the plan period or • a replacement for the space or facilities lost is made available, of at least equivalent quantity and quality, and in a suitable location to meet the current and future needs of users of the existing space or facility	A stated in the Planning Statement (document reference 5.6), the Project has taken a precautionary approach to the identification of potential open space. The Project has no direct interaction or would result in the loss or material impact on any of the Open Space, Sport and Recreation Facilities identified in the Sproughton Neighbourhood Plan.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		Any replacement provision should take account of the needs of the settlement where the development is taking place and the current standards of open space and sports facility provision adopted by the local planning authority. Facilities must be fully inclusive and cater to those of all ages and abilities. Where necessary to the acceptability of the development, the local planning authority will require developers of new housing, office, retail and other commercial and mixed development to provide open space including play areas, formal sport/recreation areas, amenity areas and where appropriate, indoor sports facilities or to provide land and a financial contribution towards the cost and maintenance of existing or new facilities, as appropriate. These facilities will be secured through the use of conditions and/or planning obligations. Clubhouses, pavilions, car parking and ancillary facilities must be of a high standard of design and internal layout. The location of such facilities must be well related and sensitive to the topography, character and uses of the surrounding area, particularly when located in or close to residential areas and should be accessible by safe, connected, and inclusive walking and cycle routes and public transport networks. Proposals which give rise to intrusive floodlighting will not be permitted.	
	Policy SPTN 20 – Public Rights of Way	Measures to improve and extend the existing network of public rights of way will be supported if	Details of the strategy for PRoWs and the management regimes can be found within the Outline PRoW Management Plan

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• existing or new public rights of way are connected with neighbouring parishes to extend and develop the public rights of way with the Gipping Valley • they lead to development of new bridleways to support the local equestrian community with the local and neighbouring parishes • their value as biodiversity/wildlife corridors is recognised and protected and efforts are made to enhance biodiversity as part of the proposal • comprehensive signage is provided to encourage community and visitor use of the public rights of way within the parish	(document reference 7.6). The following PRoW within the Sproughton Neighbourhood Plan area are identified as being subject to management (e.g. temporary closure and diversion or temporary closure (managed)) of between 3 days and two months: • W-486/004/0 • W-392/003/0
Copdock and Washbrook	A new Copdock & Washbrook Neighbourhood Development Plan (NDP) is being prepared by the Parish Council and local community. When complete it will be used to help guide and shape future development in the parish. A previous NDP had been rejected when it was put to a local referendum in March 2022. This new NDP, which covers the plan period 2023 - 2037, retains many elements of the original plan but has also been updated where necessary.		
Ardleigh (21 October 2024)	Policy GDP - General Approach to Development	Within the Settlement Development Boundary, small scale development for no more than 10 dwellings or for community and employment uses will be supported in line with policies in the development plan. Outside the Settlement Development Boundary and outside of the Tendring Colchester Borders Garden Community, new development will not generally be permitted unless it is consistent with all other relevant Development Plan policies and: All other development • The proposal is appropriate in scale and impact to its location and context; and	The Project is a utility infrastructure development which is to be sited outside of the settlement boundaries defined on the Ardleigh Neighbourhood Plan Proposals Map. The Project has been subject to a comprehensive routeing and siting process. A detailed summary of this process is available in ES Chapter 3: Alternatives (document reference 6.3). This describes the approach adopted in selecting a route for the overhead line and siting location for the proposed East Anglia Connection Node (EACN) Substation. In

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• It would provide necessary support for a new or existing business that is appropriate to the rural area; or • It would directly provide for the conservation, enhancement or appropriate enjoyment of the countryside.	addition, the Design Development Report (document reference 5.15) which explains the changes to the Project as a result of the 2024 Statutory Consultation and the additional 2025 targeted consultations.
	Policy EP - Natural, Built & Historic Environment	Outside of the Tendring Colchester Borders Garden Community, development will be supported provided: a) Its design is of a high quality and takes account of the Village Design Statement or any successor document, paying particular attention to appropriate: i. Siting; ii. Layout; iii. Form and scale; iv. Architectural style v. Materials; vi. Relationship to surrounding development; vii. Impact on important built and landscape features; viii. Landscaping and boundary treatments; ix. Car parking provision; and x. Accessibility. b) It does not result in a harmful urbanising effect on a rural lane or street (for example, as a	Chapter 5 of the Planning Statement (document reference 5.6), the Design and Access Statement (document reference 7.15) and Design Approach to Site Specific Infrastructure (document reference 7.16) explains how good design has been embedded in the Project from the outset. The design for the Project is set out in detail in ES Chapter 4: Project Description (document reference 6.4), which describes the design submitted within the application. This should be read alongside ES Chapter 3: Alternatives (document reference 6.3), which documents the key environmental factors that were considered in the optioneering and design evolution process. Landscape and visual mitigation is proposed at EACN Substation. Proposed as 'Environmental Areas'. This multi-functional area has been prioritised, to provide mitigation or enhancements for different environmental aspects i.e. sites where landscape and visual mitigation and biodiversity gains could be achieved together. Proposals are presented within

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		result of hedgerow removal or loss of an open view); c) There is no urban intrusion (including as a result of light or noise pollution or increased vehicular traffic) into currently tranquil rural areas; d) There is no net loss of good quality green landscape features (including trees, hedges and shrubs) and all new green landscape features are of appropriate local or native species; e) Appropriate opportunities are incorporated to support local biodiversity and wildlife including net gain; f) There is no unnecessary loss of best and most versatile agricultural land to non compatible uses (the onus will be on the developer to establish the quality of any agricultural land proposed for other uses); g) Development in the Conservation Area or within its setting preserves or enhances its character or appearance and takes the Conservation Area Appraisal into account; and h) Development affecting a Listed Building or its setting preserves or enhances its significance and is supported by a proportionate Heritage Impact Assessment	Appendix D of the Outline Landscape and Ecological Management Plan (LEMP) (document reference 7.4). The design considerations reflect National Grid's duty to be economical and efficient, as well as within the rigorous health and safety processes that National Grid has in place which govern how National Grid designs and constructs their projects safely. The Design Development Report (document reference 5.15), Design and Access Statement (document reference 7.15) and Design Approach for Site Specific infrastructure (document reference 7.16) summarises the different choices made during the design process. As set out in the Biodiversity Net Gain Report (document reference 7.1) National Grid is committed to deliver a minimum of 10% Biodiversity Net Gain. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once re-established. The Outline Landscape and Ecological Management Plan (LEMP) (document reference 7.4) identifies landscape proposals around the EACN Substation.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
	Policy LGP - Local Green Spaces	The following spaces are designated as Local Green Spaces: • Space 1: Fishing lake north of Colchester Road • Space 2: Manor House meadow • Space 3: Woodlands attached to Birch Wood • Space 4: Hart's Lane orchard • Space 5: Car park land • Space 6: Glebe Corner land • Space 7: Harwich Road allotments. In the LGSs, new development will be managed in a way that is consistent with national policy on Green Belts. Development adjacent to a LGS will be supported provided it is compatible with the LGS.	The Project interacts with two areas of Local Green Space identified in the Ardleigh Neighbourhood Plan. These are: • Fishing lake north of Colchester Road and • Glebe Corner. The over sail of the fishing lake north of Colchester Road has been raised in consultation feedback at various stages in the development of the Project. National Grid has sought to identify alternative alignments to avoid this over sail. The potential changes which were considered would necessitate multiple changes of direction, given routeing constraints and the presence of residential properties, whether passing to the east (residential properties within 200 m) or west (residential properties within around 100 m) of the water body. These multiple angle changes would reduce consistency with the Holford Rules and increase effects to multiple residential properties close to the alignment in this area. It is acknowledged that the over sail of this water body would prevent the current private angling activities from continuing. An open space assessment in accordance with EN-1 has been undertaken to establish the availability of alternative fishing locations nearby. This assessment is set out in Appendix B of the

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			Planning Statement (document reference 5.6.B). The works proposed at Glebe Corner involve the undergrounding of an existing third-party overhead line. Whilst there will be an impact on this local green space, it will only be of a temporary duration with the land restored. In considering development on Local Green Space, it is acknowledged that the considerations applied to development in the Green Belt are relevant. As set out in the Planning Statement, as an engineering operation, it is not considered that overhead lines represent inappropriate development in the Green Belt. The substantial public benefits and need for the Project, as set out in Chapter 3 of the Planning Statement (document reference 5.6), including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives and carbon reduction commitments is considered to outweigh the over sailing of the fishing lake and Local Green Space.
Section D			
Boxted (July 2016)	Policy LC2: Protection of Landscape Character	Where a new development of three or more dwellings or 500m² or more of floorspace is either outside a settlement boundary or inside a settlement boundary but contiguous to it, it must be accompanied by a landscape assessment.	Whilst the policy is not directly relevant to the Project, ES Chapter 13: Landscape and Visual (document reference 6.13) presents the assessment of likely significant landscape and visual effects

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		This landscape assessment must consider the impact that development would have on the local landscape character and must demonstrate that any impacts can be appropriately mitigated. Any proposal that is not capable of mitigating the impacts of development will not be permitted.	that could result from the Project. ES Chapter 13: Landscape and Visual (document reference 6.13) highlights the baseline condition (Section 13.5) of landscape characters and visuals referring to the sections of the Project that they are located. Within the Boxted Neighbourhood Plan area, the relevant viewpoints for the Project are VP4.36, VP4.19, VP4.02 and VP4.18. Visual receptors are grouped into Visual Receptor Areas (VRAs) based on location, landscape characteristics, and similar views, as shown in ES Figure 13.7: Visual Receptors and Viewpoints (document reference 6.13.F7). VRAs and representative viewpoints were identified through site surveys, desktop analysis, and Neighbourhood Plans. Visual effects of linear developments, like overhead lines, are assessed using representative viewpoints to capture typical views, following GLVIA3 guidelines for a proportionate and focused LVIA. Whilst important views have been considered, individual assessments from each identified location have not been presented in the LVIA.
	Policy SM1: loss of visual amenity/unacceptable noise impact from	Any unacceptable loss of visual amenity and unacceptable levels of noise impact on the surrounding area and the parish in general arising as a result of commercial development in Boxted parish will not be permitted. Proposals for such	ES Chapter 13: Landscape and Visual (document reference 6.13) presents the assessment of likely significant landscape and visual effects that could result from the Project. ES Chapter 13: Landscape

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
	Commercial activity	commercial activity must demonstrate that any impacts can be properly mitigated through actions such as appropriate visual and noise screening.	and Visual (document reference 6.13) highlights the baseline condition (Section 13.5) of landscape characters and visuals referring to the sections of the Project that they are located. Within the Boxted Neighbourhood Plan area, the relevant viewpoints for the Project are VP4.36, VP4.19, VP4.02 and VP4.18. Visual receptors are grouped into Visual Receptor Areas (VRAs) based on location, landscape characteristics, and similar views, as shown in ES Figure 13.7: Visual Receptors and Viewpoints (document reference 6.13.F7). VRAs and representative viewpoints were identified through site surveys, desktop analysis, and Neighbourhood Plans. Visual effects of linear developments, like overhead lines, are assessed using representative viewpoints to capture typical views, following GLVIA3 guidelines for a proportionate and focused LVIA. Whilst important views have been considered, individual assessments from each identified location have not been presented in the LVIA. With regard to noise, ES Chapter 14: Noise and Vibration (document reference 6.14) presents the assessments of the likely significant noise and vibration effects that could result from the construction and operation of the Project.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			The Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts.
Great Horkesley	The neighbourhood plan is yet to be adopted. The Great Horkesley Neighbourhood Plan Area was designated in June 2022.		
West Bergholt (October 2019, amended October 2024)	PP3: Open Spaces	Development proposals that ensure new open spaces are intrinsic to their proposals and not designated as single purpose use but deliver multiple functions and benefits, which link to the green infrastructure network, through green corridors, cycle or footpaths and demonstrate environmental gains will be supported.	An assessment of the impact of the Project on open spaces, including green infrastructure is included the Planning Statement (document reference 5.6). The Project has no direct interaction with any of the Open Space in the West Bergholt Neighbourhood Plan. With regard to environmental gains, has committed to deliver at least 10% BNG with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the Biodiversity Net Gain Report (document reference 7.1). The Outline Code of Construction Practice (CoCP) (document reference 7.2) contains relevant measures relating to Ecology and Biodiversity which demonstrate examples of where the Project will seek to identify opportunities for enhancement. These measures include but are not limited to: • B12: Where temporary habitat removal is required to facilitate construction,

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			this will be reinstated. Reinstatement will aim to provide habitats of equal or better value to those affected and permanent land take will be mitigated with additional habitat creation/ enhancement; minimum of 10 % BNG is being sought. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once re-established
	Policy PP5: Character Area.	The “Character Area” designated on Map PP5, which reflects the built local distinctiveness of Essex’s heritage, will be protected from degradation. Development proposals will be expected to respect its features and character in relation to the scale, design and setting of any development.	The character area identified in the West Bergholt Neighbourhood Plan is centred around the “the Lanes”, which has many of the older village buildings. The Project is remote from the area identified within the Neighbourhood Plan. ES Chapter 13: Landscape and Visual (document reference 6.13) presents the landscape and visual assessment. Information on landscape character has been used to inform the visual assessment.
	Policy PP6: Trees and Hedgerows.	Development proposals which conserve trees and/or hedgerows will be supported. Where development proposals would necessitate the loss of such features, appropriate mitigation will be supported, subject to there being no protective designations in place.	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) assesses the potential impacts of the Project’s construction, operation, and maintenance phases on ecological and biodiversity receptors. Assessment related to vegetation loss assessment is based on

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			the vegetation clearance assumptions set out in ES Chapter 4: Project Description (document reference 6.4) and presented on the Trees and Hedgerows to be Removed and or Managed Plans (document reference 2.16). As set out in the Biodiversity Net Gain Report (document reference 7.1) National Grid is committed to deliver a minimum of 10% Biodiversity Net Gain. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once reestablished.
	Policy PP7: Natural Environment.	Development proposals which provide protection and where appropriate enhance biodiversity by: a) Protecting designated sites, protected species and ancient and species-rich hedgerows, grasslands and woodlands; and b) Preserving ecological networks, and the migration and transit of flora and fauna; and c) Protecting ancient trees or trees of arboricultural value, or ancient woodlands; and d) Promoting the mitigation, preservation, restoration and recreation of wildlife habitats, and the protection and recovery of priority species; and e) Providing a net gain in flora and fauna; and	The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) assesses the potential impacts of the Project's construction, operation, and maintenance phases on ecological and biodiversity receptors. Habitat connectivity will be preserved where possible by utilising existing access routes, minimising working widths through biodiversity receptors, and

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		f) Adopting best practice in sustainable urban drainage with development proposals incorporating the provision of Sustainable Drainage Systems (SuDS) unless it can be demonstrated to be technically unfeasible, will be supported. Proposals which demonstrate that ecological considerations have been properly assessed in relation to likely impacts and where appropriate proportionate mitigation measures are agreed, will be supported.	maintaining connectivity via green corridors such as hedgerows and watercourses. As set out in the Biodiversity Net Gain Report (document reference 7.1) National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. Within the West Bergholt Neighbourhood Plan area, the project will utilise sustainable drainage basins during construction. As set out in Commitment Reference W13 of the outline Code of Construction Practice (document reference 7.2) access roads and haul roads, as well as areas where impermeable material will be installed where heavy equipment would be used, will also have suitable drainage provisions via appropriate SuDS that will provide attenuation and treatment of runoff.
	Policy PP10: Design	All new development should be of a high-quality design and sustainable construction is encouraged. Account should be taken of the guidance and principles in the Village Design Statement, which seeks to promote or reinforce local distinctiveness. In particular new	At multiple stages of the options appraisal process, National Grid has carried out assessments which consider the efficiency and the economic benefits of the Project. The Design Development Report (document reference 5.15), Design and Access Statement (document reference

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		development and any additions or extensions to existing dwellings will be expected to: • Have an acceptable visual impact on the valley sides; and • Give careful consideration to mitigating the impact on views across the village; and • Buildings must respect the character of and be in harmony with their surroundings in respect of plot width, layout, building lines, materials, height, proportion, scale and massing; and • Planning applications must show contextually the impact of their proposals on adjacent buildings by means of adequately detailed plans with accurate street elevations to avoid unacceptable adverse impact upon the amenities of the occupiers of nearby residential properties; and • Details of boundary walls, fences and gates shall reflect the character, design and materials of means of enclosure within the village to mitigate the impact of urbanisation.	7.15), Design Approach for Site Specific infrastructure (document reference 7.16) Chapter 5 of the Planning Statement (document reference 5.6) explains how good design has been embedded in the Project from the outset again the '*criteria for good design for Energy Infrastructure*' contained in Part 4.7 of EN-1. The application is accompanied by an Environmental Statement which provides the final assessment of likely significant effects, associated with the Project during its construction and operation. The design for the Project is set out in detail in ES Chapter 4: Project Description (document reference 6.4), which describes the design submitted within the application. This should be read alongside ES Chapter 3: Alternatives (document reference 6.3), which documents the key environmental factors that were considered in the optioneering and design evolution process. The design considerations reflect National Grid's duty to be economical and efficient, as well as within the rigorous health and safety processes that National Grid has in place which govern how National Grid designs and constructs their projects safely. The Design Development Report (document reference 5.15), Design and Access Statement (document reference 7.15) and Design Approach for Site

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			Specific infrastructure (document reference 7.16) which describes the approach to the siting of the CSE compound to the north of Colchester Road (just outside of the West Bergholt Neighbourhood Plan Area).
Eight Ash Green (December 2019)	Environment Policy 1.	Development beyond the settlement boundary of Eight Ash Green as defined on the Village Settlement Boundary Map resulting in coalescence between Eight Ash Green and neighbouring and existing and proposed settlements in adopted plans will not be supported	The Project is a utility infrastructure development which is to be sited outside of the settlement boundaries defined on the Eight Ash Green Neighbourhood Plan Village Settlement Boundary Map. The Project has been subject to a comprehensive routeing and siting process. A detailed summary of this process is available in ES Chapter 3: Alternatives (document reference 6.3).
	Environmental Policy 3	Environment Policy 3 (EP 3): Development proposals in the Neighbourhood Plan Area resulting in the destruction and/or removal of existing hedgerows will only be supported if replaced, on the same site	The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) assesses the potential impacts of the Project's construction, operation, and maintenance phases on ecological and biodiversity receptors. Assessment related to vegetation loss assessment is based on the vegetation clearance assumptions set out in ES Chapter 4: Project Description (document reference 6.4) and presented

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			on the Trees and Hedgerows to be Removed and or Managed Plans (document reference 2.16). Where hedgerows are to be removed, reinstatement will aim to provide habitats of equal or better value to those affected and permanent land take will be compensated; minimum of 10% BNG will be achieved. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once re-established. Further details are set out in the Biodiversity Net Gain Report (document reference 7.1) and the outline CoCP (document reference 7.2) which includes the following commitment B12: Where temporary habitat removal is required to facilitate construction, this will be reinstated. Reinstatement will aim to provide habitats of equal or better value to those affected and permanent land take will be mitigated with additional habitat creation/ enhancement; minimum of 10 % BNG is being sought. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			and continuous hedgerows, once re-established.
	Environmental Policy 4	Existing footpaths, cycleways and bridleways shown on the Eight Ash Green Neighbourhood Areas Policies Map provide a high level of amenity value and will be protected. New developments which integrate with the current green infrastructure network improving the connectivity between local wildlife sites and green spaces improving and extending the existing footpath and cycle path network, allowing greater access to housing and retail facilities, green spaces, public open spaces and the countryside will be supported.	Details of the strategy for PRoWs and the management regimes can be found within the Outline PRoW Management Plan (document reference 7.6). The assessment states that no PRoW in the East Ash Green Neighbourhood Plan area interacts with the Project and construction activities.
	Environmental Policy 5	Development will be supported where it is shown that drainage strategies for major development within the Plan area accord with the Essex SuDs Guide and will not negatively impact upon the existing network of drainage ditches within the Neighbourhood Area. The protection, extension and enhancement of these facilities are encouraged. Where it is necessary to enable development, any changes to a watercourse may require consent from Essex County Council as the Lead Local Flood Authority (LLFA) for an ordinary watercourse, or the Environment Agency for main rivers. Developers should contact the LLFA or Environment Agency for further advice.	ES Chapter 12 Hydrology, Land Drainage and Flood Risk (document reference 6.12) outlines the standard and additional mitigation measures relevant to hydrology, land drainage, and flood risk. In a consultation with Environment Agency and LLFA (September 2024) National Grid has provided its full responses in Appendix A of the Flood Risk Assessment (FRA) (document reference 7.9). In overview, the advice provided with regard to SuDS would be adhered to in detailing the operational surface water drainage strategy and construction surface water management plan to be developed by the appointed contractor. Climate change allowances in accordance with published Environment Agency (EA) guidance would be utilised and it is confirmed that

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			temporary works such as watercourses crossings may be in place for up to 5 years.
	Heritage Policy 1	Any Listed Building or Heritage Asset and their setting within the Neighbourhood Plan Area should be maintained or where possible enhanced to protect from any future development.	ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the assessment of the likely significant cultural heritage effects that could result from the Project. There would be direct impact on Listed Building or Heritage Assets within the East Ash Green Neighbourhood Plan Area. The Historic Environmental Baseline Report (document reference 6.11.A1, includes an assessment of the following Grade II Listed Buildings Mantills Farmhouse, Green Acres and Chippetts Farmhouse noting that there setting does not extend to the Order Limits. Fiddlers Farmhouse (Grade II Listed Building) has a setting which does extend to the order limits. A further assessment is reported in the Historic Environment Assessment Tables (document reference 6.11.A2) which has addressed the effects of the Project on this designated asset as not significant. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy,

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets.
The Marks Tey (8 April 2022)	Policy MT05 – Local Character and Design	All development proposals should contribute in a positive way to the quality of the built environment and settings in the parish. Development proposals must be the result of a design-led process with regards to a scheme's location, layout, design, choice of building materials and density. To be supported, development proposals must also be sympathetic to the existing character and history of Marks Tey including its built environment (whereby nearly all buildings in the parish are low in height, built either to ribbon or estate style development on good sized plots, using mainly brick and timber with some plaster work) and landscape setting; details of which are provided in the Marks Tey Character Assessment (available to view alongside this Neighbourhood Plan). Innovative approaches to design will be welcomed where this will add to the overall quality of the neighbourhood and parish for example via self build or custom build development. Key considerations and recommendations for all schemes include: • For proposals in the Little Tey Character Area:	The Project is identified as being routed through Character Area 1: Little Tey. The Design Development Report (document reference 5.15), Design and Access Statement (document reference 7.15), Design Approach for Site Specific infrastructure (document reference 7.16) Chapter 5 of the Planning Statement (document reference 5.6) explains how good design has been embedded in the Project from the outset and how the Project accords with the '*criteria for good design for Energy Infrastructure*' contained in Part 4.7 of EN-1. The design for the Project is set out in detail in ES Chapter 4: Project Description (document reference 6.4), which describes the design submitted within the application. This should be read alongside ES Chapter 3: Alternatives (document reference 6.3), which documents the key environmental factors that were considered in the optioneering and design evolution process. The design considerations reflect National Grid's duty to be economical and efficient, as well as within the rigorous health and

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• Protect the tranquil and rural environment along Church Lane. • All development to be in keeping with existing pattern of low density linear development. • Protect the open landscape between Little Tey and Marks Tey. • Mitigate the residential amenity and traffic management issues as a result of the busy and congested A120 as the principal access corridor. For proposals in the Long Green Character Area: • Be sympathetic to the existing character, comprising low density residential development, away from busy through-roads connected through network of green spaces and pedestrian friendly routes • Retain or enhance the rural lanes which provide a rural setting to the residential areas and connectivity to the public rights of way • Respect, and not adversely impact the open views looking northwards from the A120 towards the Grade I listed St. Andrews Church (located in Roman River Character area). • Mitigate the residential amenity issues and poor street scene environment created through the busyness on the A120. For proposals in the Potts Green Character Area: • Retain or enhance the pedestrian links from Old London Road, up Dobbies Lane over the railway line to the Marks Tey estates.	safety processes that National Grid has in place which govern how National Grid designs and constructs their projects safely. The Design Development Report (document reference 5.15), Design and Access Statement (document reference 7.15) and Design Approach for Site Specific infrastructure (document reference 7.16) summarises the different choices made during the design process. The application is accompanied by an Environmental Statement which provides the final assessment of likely significant effects, associated with the Project during its construction and operation. ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the assessment of the likely significant cultural heritage effects that could result from the Project. The Historic Environmental Baseline Report (document reference 6.11.A1) includes an assessment of the Grade I listed 'St James's Church', which is located north of Little Tey, between 150 m and 200 m south of the Order Limits. The Historic Environment Assessment Tables (document reference 6.11.A2) conclude that the construction and operational effects of the Project on this designated asset would not be significant. National Grid has undertaken an iterative design process which responds to policy

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• Mitigate the residential amenity issues created through the busyness of the A12. • Retain or enhance connectivity to historic village green at Potts Green. • For proposals in the Roman River: • Conserve or enhance the Grade I listed St Andrews Church and its setting. • Retain the strong sense of tranquillity along Church Lane. • Adequately address the constraints on any development created by the narrow bridge on North Lane and areas of flood risk along the Roman River. For Proposals in The Village: • Conserve or enhance the Grade II listed Marks Tey Hall and its setting. • Take opportunities to improve the street scene environment around the London Parade shops. • Take opportunities to improve the connectivity between the areas currently segregated by the road infrastructure through measures which improve the attractiveness of pedestrian routes and create more direct routes. • Retain existing and take opportunities to create new green infrastructure. • Prioritise design and layout that increases coherence and strengthens sense of place. Development proposals which adopt innovative approaches to the construction of low carbon homes and buildings which demonstrate	requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) assesses the potential impacts of the Project's construction, operation, and maintenance phases on ecological and biodiversity receptors. Habitat connectivity will be preserved where possible by utilising existing access routes, minimising working widths through biodiversity receptors, and maintaining connectivity via green corridors such as hedgerows and watercourses. National Grid has sought to avoid Church Lane which is identified as being in the Marks Tey Neighbourhood Plan as being a locally valued landscape feature (tree and hedgerow lined ancient lane). Whilst this feature will need to be crossed, National Grid have sought to identify existing points of access to minimise any vegetation removal. The Trees and Hedgerows to be removed and or managed plans (Section D, Sheet 8 of 9) (document reference 2.16) identifies a tree group on Church

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		sustainable use of resources and high energy efficiency levels (for example construction to Passivhaus or similar standards) will be welcomed.	Lane which may be potentially affected to facilitate access to the main construction area. As set out in the Biodiversity Net Gain Report (document reference 7.1) National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once re-established. ES Chapter 13: Landscape and Visual (document reference 6.13) highlights the baseline condition (Section 13.5) of landscape characters and visuals referring to the sections of the Project that they are located. Within the Marks Tey Neighbourhood Plan area, the relevant viewpoints for the Project are VP4.21 and VP4.33 - Marks Tey Railway Station. Visual receptors are grouped into Visual Receptor Areas (VRAs) based on location, landscape characteristics, and similar views, as shown in ES Figure 13.7: Visual Receptors and Viewpoints (document reference 6.13.F7). VRAs and representative viewpoints were identified

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			through site surveys, desktop analysis, and Neighbourhood Plans. Visual effects of linear developments, like overhead lines, are assessed using representative viewpoints to capture typical views, following GLVIA3 guidelines for a proportionate and focused LVIA. Whilst important views have been considered, individual assessments from each identified location have not been presented in the LVIA.
	Policy MT06 – Landscape Character, Views and Setting	Development proposals will be supported where they recognise, maintain and where possible enhance landscape character in Marks Tey parish. Areas of open land which make a high contribution towards physical and visual separation between Marks Tey and Copford, between Marks Tey and Little Tey and between Marks Tey and Easthorpe shall be safeguarded from inappropriate development. To be supported development proposals must • retain open corridors which connect the built environment to the surrounding countryside; and • maintain or enhance the setting of the following locally identified important views which contribute to sense of place in the parish (described in Table 6.9 and identified in Maps 4.3 to 4.7). – View 1a) – Long Green (See Map 4.4) A view from the railway line pedestrian bridge	ES Chapter 13: Landscape and Visual (document reference 6.13) highlights the baseline condition (Section 13.5) of landscape characters and visuals referring to the sections of the Project that they are located. Within the Marks Tey Neighbourhood Plan area, the relevant viewpoints for the Project are VP4.21 and VP4.33 - Marks Tey Railway Station. Visual receptors are grouped into Visual Receptor Areas (VRAs) based on location, landscape characteristics, and similar views, as shown in ES Figure 13.7: Visual Receptors and Viewpoints (document reference 6.13.F7). VRAs and representative viewpoints were identified through site surveys, desktop analysis, and Neighbourhood Plans. Visual effects of linear developments, like overhead lines, are assessed using representative viewpoints to capture typical views, following GLVIA3 guidelines for a

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		looking out towards Long Green (a historic site of the village green) – View 1b) – Looking south of railway line. (See Map 4.5) – View 2 – Wilsons Lane - footpath to Elm Lane (See Map 4.4) A view from Wilsons Lane looking out over the footpath towards Elm Lane – View 3a)– Little Tey (See Map 4.3) A wide landscape view looking east and west – View 3b) – Little Tey Towards St. James the Less Church (See Map 4.3) A view taken on Church Lane looking towards the Grade 1 listed church – View 4 – Motts Lane bridleway (see Map 4.4) A wide landscape view looking north, east and west from Mott's Lane Bridleway – View 5 – St. Andrews Church from the A120 Coggeshall Road (see Map 4.4) From Ashbury Drive roundabout on A120 looking north towards Aldham and towards the Grade 1 listed church – View 6a –St. Andrews Church from road bridge (See Map 4.6) This view is enjoyed from the road bridge that crosses over the railway line looking north towards the Grade I listed church. It is also enjoyed from trains pulling out of the station, just before going under the A120 road bridge. – View 7 – Aldham (See Map 4.6) This view is enjoyed from the railway station footbridge looking north towards Aldham	proportionate and focused LVIA. Whilst important views have been considered, individual assessments from each identified location have not been presented in the LVIA.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		– View 8 - Roman River Valley (See Map 4.6) This is a view looking east and west from the little bridge over the Roman River on North Lane. – View 9 – Wooded area south of Methodist church (see Map 4.7) This view is to the south of the Methodist Church looking south over wooded area – View 10 – Marks Tey Hall (See Map 4.7) This is a view from the public footpath looking west towards the Grade II listed building. – View 11 - Potts Green - site of village green (See Map 4.5) This is a wide landscape view taken from the public footpath on Doggetts Lane towards the south overlooking the historic village green	
	Policy MT07 Non-designated Heritage Assets	The following buildings and assets, as described in Appendix 3 to the Plan, have been identified as non-designated heritage assets. Proposals should seek to conserve or enhance the significance of the heritage assets listed in this policy as well as any additional non-designated heritage assets which are located in the plan area and included in the most up to date Colchester Borough Local List. Where proposals have any effect on a non-designated heritage asset, a balanced judgement will be applied having regard to the scale of any harm or loss and the significance of the heritage asset.	ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		Character Area 2a – Long Green: • White Essex weather boarded old farm cottages 91 and 93 Coggeshall Road • The Old Thatched Cottage 85 Coggeshall Road • 25 Coggeshall Road Character Area 2b – Potts Green: • Hammer Farm House, Doggetts Lane • Site of former Potts Green Character Area 3a – Roman River: • Church Farm House and outbuildings • Railway station (original building waiting room and section of original canopy) Character Area 3b – the Village: • Old Rectory Court, Station Road • The Old Cottages, Old London Road • Former Methodist Church, London Road • Wynscroft, Number 1 London Road (previously known as Butcher's Cottage)	cultural heritage and archaeological assets.
	Policy MT10 Protecting and Enhancing the Quality and Quantity of our Green Infrastructure	New development proposals will be expected to contribute to the provision of green infrastructure in the parish in terms of both quality and/or quantity having regard to the following priorities and aspirations: Priorities and aspirations regarding the creation of new green infrastructure: • Connecting and interlinking existing green infrastructure;	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) assesses the potential impacts of the Project's construction, operation, and maintenance phases on ecological and biodiversity receptors. Habitat connectivity will be preserved where possible by utilising existing access routes, minimising working widths through biodiversity receptors, and maintaining connectivity via green

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• The creation of new routes which link in with existing public rights of way network and offer enhanced access to the countryside; • An aspiration to create a continuous, accessible green corridor to the West of Marks Tey incorporating historic landscapes of Long Green and Potts Green as indicated on Map 6.6; • An aspiration to create a continuous accessible green corridor to the north of Marks Tey broadly following Roman River Corridor and the surrounding countryside as indicated in Map 6.7; and • Reinstating the historic Potts Green as a public open space. Priorities and aspirations regarding improvements to the quality of existing green infrastructure: • Improved landscaping scheme that benefits wildlife in the recreation ground; • Improved pedestrian and cycle friendly access from residential areas to the recreation ground; • Improved planting on the Marks Tey residential estates; • Improved play facilities on the Marks Tey residential estates; and • Enhancements to the rural lanes identified in Policy MT08.	corridors such as hedgerows and watercourses. As set out in the Biodiversity Net Gain Report (document reference 7.1) National Grid committed to deliver at least 10% BNG with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once re-established.
	Policy MT11 – Protecting and Enhancing our	The sites identified on Maps 6.8 (a, b, c and d) and listed below have been identified by the local community as parish wildlife sites and as being important for purposes of maintaining and	National Grid has noted the location of these four Parish Wildlife Sites. The Project has been designed, as far as possible, following the mitigation hierarchy

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
	Natural Environment	enhancing biodiversity in the parish. To be supported, development proposals adjacent or in close proximity to the wildlife sites must protect or enhance their biodiversity value. • Little Tey Churchyard Local Wildlife Site • Granger's Lane • Marks Tey Brick Pit SSSI Local Wildlife Site • Area of deciduous woodland behind the Methodist Church on Old London Road Other assets of biodiversity value in our parish are also precious including the Roman River, our ponds, hedgerows and trees including those indicated on the Character Assessment Character Area maps. Development proposals will be expected to retain existing features of biodiversity value on site or likely to be affected by the development and provide a measurable net gain in biodiversity through for example: • The creation of new natural habitats; • The planting of additional trees and hedgerows; and • Creating new wildlife corridors linking up existing ones. In the case of development proposals coming forward on land that may have been affected by contamination (for example, as a result of its previous use and that of the surrounding land or development that potentially may cause contamination), sufficient information should be provided with the planning application to satisfy	in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. The Project avoids all four Parish Wildlife sites identified in the Marks Tey Neighbourhood Plan. The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) assesses the potential impacts of the Project's construction, operation, and maintenance phases on ecological and biodiversity receptors. Assessment related to vegetation loss assessment is based on the vegetation clearance assumptions set out in ES Chapter 4: Project Description (document reference 6.4) and presented on the Trees and Hedgerows to be Removed and or Managed Plans (document reference 2.16). Within Marks Tey it will be necessary to remove sections of hedgerow and removal trees to enable construction to take place. Where hedgerows are to be removed, reinstatement will aim to provide habitats

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		the requirements of the NPPF for dealing with land contamination. This should take the form of a Preliminary Risk Assessment (including a desk top study, conceptual model and initial assessment of risk) and provide assurance that the risk to the water environment is fully understood and can be addressed through appropriate measures.	of equal or better value to those affected and permanent land take will be compensated; minimum of 10% BNG will be achieved. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once re-established. Further details are set out in the Biodiversity Net Gain Report (document reference 7.1) and the outline CoCP (document reference 7.2) which includes the following commitment B12: Where temporary habitat removal is required to facilitate construction, this will be reinstated. Reinstatement will aim to provide habitats of equal or better value to those affected and permanent land take will be mitigated with additional habitat creation/ enhancement; minimum of 10 % BNG is being sought. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once re-established.
Great Tey (16th October 2024)	Policy GTTEY2: Landscaping	• New development must ensure that it minimises the visual impact on the natural and historic environment of Great Tey.	ES Chapter 13: Landscape and Visual (document reference 6.13) highlights the baseline condition (Section 13.5) of

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• Major new development adjacent to the existing built-up area of Great Tey village should not create a hard edge and, where possible, retain a green buffer. A green buffer should be sufficiently wide to accommodate some or all of the following features: – the planting of avenues of street trees of which, by virtue of their species, have a large canopy and root structure when mature; – hedges/hedgerows; – recreational facilities such as benches and water features; – wide footways and cycling routes. • All development proposals should seek where possible to retain mature trees, hedges, hedgerows and shrubs as part of the design of development. This is particularly important on the boundary of properties that front onto existing roads and lanes. • Development which affects a heritage asset and its setting and/or the Conservation Area must demonstrate how this has been adequately mitigated through the appropriate use of green screening.	landscape characters and visuals referring to the sections of the Project that they are located. Within the Great Tey Neighbourhood Plan area, the relevant viewpoints for the Project are VP4.10, VP4.32, VP4.06 and VP4.26. Visual receptors are grouped into Visual Receptor Areas (VRAs) based on location, landscape characteristics, and similar views, as shown in ES Figure 13.7: Visual Receptors and Viewpoints (document reference 6.13.F7). VRAs and representative viewpoints were identified through site surveys, desktop analysis, and Neighbourhood Plans. Visual effects of linear developments, like overhead lines, are assessed using representative viewpoints to capture typical views, following GLVIA3 guidelines for a proportionate and focused LVIA. Whilst important views have been considered, individual assessments from each identified location have not been presented in the LVIA. ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. The Historic Environment Baseline Report (document reference 6.11.A1) states that The Great Tey Conservation Area is c. 850 m north of the Order Limits. The conservation area's landscape blends the charm of pastoral surroundings with the presence of historical structures, offering a glimpse into the region's cultural heritage. The juxtaposition of tranquil residential areas, bustling main roads, and open green spaces characterizes the Great Tey conservation area, creating a unique blend of urban and rural elements within its boundaries. In summary, the conservation area derives its evidential and historical value from its listed buildings, and its open green areas further augment its overall value. The conservation area is situated within an urban setting, characterised by extensive views from both the north-east and south-east directions. Within its immediate surroundings, several smaller green spaces enhance its overall value. While the setting undeniably contributes significantly to its worth, it remains contained within the conservation area's

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			boundaries, not extending to the Order Limits. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) assesses the potential impacts of the Project's construction, operation, and maintenance phases on ecological and biodiversity receptors. Assessment related to vegetation loss assessment is based on the vegetation clearance assumptions set out in ES Chapter 4: Project Description (document reference 6.4) and presented on the Trees and Hedgerows to be Removed and or Managed Plans (document reference 2.16). Within the Great Tey Neighbourhood Plan Area it will be necessary to remove sections of hedgerow and removal trees to enable construction to take place. The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. As set out in the Biodiversity Net Gain Report (document reference 7.1) National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			combination of on-site and off-site mitigation. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once re-established.
	Policy GTTEY3: Views	Development must ensure that it does not impact on the historic or natural landscape setting of Great Tey. In particular, the following views as shown on Figure 4.1 should be preserved: • Brookhouse Road looking south towards Walcott Hall • New Barn Road looking south west towards Brookhouse Road • Earls Colne Road looking south towards Harold Fairs Recreation Ground and St Barnabas Church • Warrens Farm gate towards St Barnabas Church Development is expected to preserve the setting of St Barnabas Church and proposals are required to consider the impact on the view to the church and ensure that it does not have a significantly detrimental impact. Development within or adjacent to the settlement boundary of Great Tey must be designed and arranged in a manner which would safeguard	ES Chapter 13: Landscape and Visual (document reference 6.13) highlights the baseline condition (Section 13.5) of landscape characters and visuals referring to the sections of the Project that they are located. Within the Great Tey Neighbourhood Plan area, the relevant viewpoints for the Project are VP4.10, VP4.32, VP4.06 and VP4.26. Visual receptors are grouped into Visual Receptor Areas (VRAs) based on location, landscape characteristics, and similar views, as shown in ES Figure 13.7: Visual Receptors and Viewpoints (document reference 6.13.F7). VRAs and representative viewpoints were identified through site surveys, desktop analysis, and Neighbourhood Plans. Visual effects of linear developments, like overhead lines, are assessed using representative viewpoints to capture typical views, following GLVIA3 guidelines for a proportionate and focused LVIA. Whilst important views have been considered,

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		views of the surrounding countryside that occur between buildings. Development adjacent to existing green open space in Great Tey should ensure that its setting is preserved.	individual assessments from each identified location have not been presented in the LVIA.
	GTTEY4: Access to the Countryside	Access to the countryside will be promoted through protection and maintenance of the existing Public Rights of Way (PROW) network (as shown in Figure 5.1), its enhancement where possible, provision of bridleways and the safety of users of rural roads and lanes. Proposals to divert PROWs or cycleways should provide clear and demonstrable benefits for the wider community. Where possible, development should enhance PROWs by improving existing routes and improving connectivity through the creation of new routes. The loss or degradation of any PROW will not be permitted in other than very special circumstances. Any development that will impact upon an existing PROW should have regard to Policy DM11 in the Essex County Council Development Management Policies (2011). All development will be required to provide well signposted and safe pedestrian and cycle connections within the site and connecting into the existing wider network, to nearby facilities, amenities, schools, public transport network and integrate with the multifunctional green infrastructure network.	Within Great Tey, there will be a requirement to temporarily close and divert seven public right of way, with the maximum impact being for the duration of the works. Details of the strategy for PRoWs and the management regimes can be found within the Outline PRoW Management Plan (document reference 7.6). The following PRoW within Great Tey are identified as being subject to management (e.g. temporary closure and diversion or temporary closure (managed): • Great Tey 21 • Great Tey 4 • Great Tey 38 • Great Tey 50 • Great Tey 59 • Great Tey 36 • Great Tey 46 • Great Tey 42 • Great Tey 45 • Great Tey 44

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
	Policy GTTEY5: Wildlife friendly development	All development proposals should deliver a minimum of 10% net gain in biodiversity in addition to protecting existing habitats and species, including hedgerows and mature trees. Development should take a 'biodiversity-first' approach and should maximise the delivery of biodiversity net gains on site. If on-site delivery is not possible then it must be clearly demonstrated that all reasonable options for on-site provision have been considered prior to off-site provision. The incorporation of design features into new development that encourages local wildlife and biodiversity to thrive will be supported. Development should be designed to retain trees, shrubs and hedgerows of arboricultural, habitat and amenity value on-site and to conserve and enhance connectivity to the wider multifunctional green and blue infrastructure networks.	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) assesses the potential impacts of the Project's construction, operation, and maintenance phases on ecological and biodiversity receptors. Habitat connectivity will be preserved where possible by utilising existing access routes, minimising working widths through biodiversity receptors, and maintaining connectivity via green corridors such as hedgerows and watercourses. This Biodiversity Net Gain (BNG) Report (document reference 7.1) has been prepared to support the Project following National Grid's commitment to deliver at least a 10% Environmental Net Gain.
	Policy GTTEY6: Dark Skies and Lighting	Development proposals should respect the dark skies that are characteristic of the Neighbourhood Area. Development should be designed to retain trees, shrubs and hedgerows of arboricultural, habitat and amenity value on-site and to conserve and enhance connectivity to the wider multifunctional green and blue infrastructure networks. Building design that results in increased light spill from internal lighting needs to be avoided, unless suitable mitigation measures are implemented. Development proposals which incorporate highway lighting will only be supported if required	ES Chapter 13: Landscape and Visual (document reference 6.13) presents the assessment of likely significant landscape and visual effects that could result from the Project. Regarding the assessment of lighting, the Landscape and Visual chapter has been based on the assumptions that: All works associated with substation - exterior and interior lighting would be provided at the site to allow for safe movement and the operation of equipment. All lighting would be designed in accordance with the appropriate design standards and be motion-sensor activated.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		by the Highways Authority for reasons of road safety.	A typical construction day will consist of 12-hours meaning in winter this would require working in the dark at either end of the day. For the purposes of the ES, it is therefore assumed that winter working will require lighting at certain sites but will not be wide scale across the Project. The Outline CoCP (document reference 7.2) contains relevant good practice measures relating to Landscape and Visual. These measures include LV03: Construction lighting will be directional and minimised where possible.
Section E			
Coggeshall (26th July 2021)	Policy 6 Protecting and Enhancing Green and Blue Infrastructure and the Natural Environment	Development proposals should protect, enhance and, increase the provision of green and blue infrastructure within the Parish. All proposals should seek to deliver net biodiversity gain, in addition to protecting existing habitats and species and enhancing the landscape and visual characteristics of the Parish. Any proposals which negatively affect, or have the potential to negatively affect, green and blue infrastructure should demonstrate that any negative impacts on recreation, biodiversity (including flora and fauna) and local wildlife habitats and corridors, will be adequately mitigated. The Green and Blue infrastructure features identified within Figures 3 and 4 should be protected and enhanced. Development proposals which are likely to have a significant negative impact upon these features should demonstrate that the benefits of development clearly outweigh	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) assesses the potential impacts of the Project's construction, operation, and maintenance phases on ecological and biodiversity receptors. Habitat connectivity will be preserved where possible by utilising existing access routes, minimising working widths through biodiversity receptors, and maintaining connectivity via green corridors such as hedgerows and watercourses. This Biodiversity Net Gain (BNG) Report (document reference 7.1) has been prepared to support the Project following National Grid's commitment to deliver at least a 10% Environmental Net Gain.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		any negative impacts, or that appropriate mitigation measures can be implemented which result in an overall improved provision of green and blue infrastructure and / or overall benefits to biodiversity, wildlife habitats and corridors within the Parish. Where appropriate, developer contributions should be sought towards the protection and enhancement of the identified features. Proposals for new areas of green and blue infrastructure should seek to incorporate pedestrian, cycle and bridleway access where appropriate. All development proposals should conserve and enhance the network of habitats, species and sites (both statutory and non-statutory, including priority habitats and species) of international, national and local importance commensurate with their status, and give appropriate weight to their importance. Development proposals which are likely to have a significant direct or indirect adverse impact on habitats, species or wildlife sites should provide an independent survey report and demonstrate that: There are no alternatives with less harmful impacts. Appropriate mitigation measures or, as a last resort, compensation measures, can be provided to achieve a net enhancement to the site's biodiversity. Development proposals which have the potential to significantly impact on a watercourse should include a long-term scheme to protect and enhance the conservation value of the	

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		watercourse and ensure access for flood defence maintenance. Development proposals should have regard to the Building with Nature Standards where appropriate.	
	Policy 7 Green Buffers	The following locations (figure 5) are designated as Green Buffers: • GB1: Land north of West Street. • GB2: Land south of West Street -'The Vineyard'. • GB3: Land adjacent to the Colchester Road, Surrex. • GB4: Land to the east & west of Kelvedon Rd between Coggeshall Hamlet and Coggeshall, excluding the PC land and allotment. Development proposals within the Green Buffer areas should: • Protect the identity and setting of existing settlements. • Be of a design, density and layout which minimises the potential for coalescence and consolidation between built areas. • Provide landscaping which minimises the visual impact of the proposed development and includes tree planting and vegetation which is predominantly native and consistent with flora in the surrounding area; and • Be supported by evidence demonstrating that they will have the least detrimental impact, and they do not significantly reduce the sensitive buffer between settlements or existing buildings where appropriate.	The Green Buffers identified in the Coggeshall Neighbourhood Plan provide a policy to ensure that the potential for coalescence between settlements is acknowledged and mitigated, and that the open countryside and historic setting of the designated areas are recognised and protected. National Grid has noted the location of the areas identified in Policy 7. The Project would not result in development in any of these four Green Buffers.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
	Policy 8 Local Green Spaces	The land at Vicarage Field identified in Figure 6 is designated as Local Green Space where inappropriate development shall not be permitted other than in very special circumstances.	An assessment of the impact of the Project on open spaces (including playing fields) is included in the Planning Statement (document reference 5.6). The Project has taken a precautionary approach to the identification of potential open space. The Project has no direct interaction with any of the Green Spaces identified in the Coggeshall Neighbourhood Plan and avoids and interaction with the Green Space to the north of West Street which is identified in Policy 8.
	Policy 9 Green Amenity Areas	The following locations (identified on Green Amenity Areas Proposals Plan, figure 7) are designated as Green Amenity Areas: • GAA1: Land to the east and west of Marks Hall Road. • GAA2: Land to the west of Coggeshall Hamlet incorporating the cricket field. GAA3: Land to the east of the Essex Way. • GAA4: Land north of Abbey Lane. • GAA5: Valley north & south of the Blackwater including agricultural land rising to the Essex Way. • GAA6: Land south of West Street, Coggeshall Town football field and associated land. Development proposals within Green Amenity Areas should respect impact on amenity value, quality of the natural environment, landscape setting, character, areas of historical importance,	An assessment of the impact of the Project on open spaces (including playing fields) is included in the Planning Statement (document reference 5.6). The Project has taken a precautionary approach to the identification of potential open space. The Project has no direct interaction with any of the six amenity areas identified in the Coggeshall Neighbourhood Plan.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		wildlife corridors, ecology, recreational assets and accessibility to the Green Amenity Areas. Development proposals within Green Amenity Areas should provide landscaping which minimises the visual impact of the proposed development, and includes tree planting and vegetation which is predominantly native and consistent with flora within the Green Amenity Area.	
	Policy 11 Preventing Pollution	Development proposals that increase air, land, water, odour, noise, or light pollution to a level which could detrimentally impact upon the health, quality of life and residential amenity of existing and future residents, the proposals should clearly demonstrate the potential risks to the human and natural environment, and how the risks will be adequately addressed by appropriate avoidance, alleviation and mitigation measures. Air Quality – • Proposals that have the potential to produce significant air pollution should be supported by an air quality assessment in accordance with Planning Practice Guidance that identifies the potential impact of the development. Assessments should identify mitigation measures that will address any deterioration in air quality as a result of the development, having taken into account where relevant all other plans and projects, and these measures should be incorporated into the development proposals.	Air Quality The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. Measures to control air quality emissions during construction are set out in the Outline CoCP (document reference 7.2) as secured via Requirement 4 in the Draft DCO. Water Quality ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) presents the assessment of likely significant water effects that could result from the Project. The construction of the Project has the potential to impact on water quality and resources associated with:

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• Where appropriate, development proposals should promote the use of deciduous and evergreen planting in public spaces, private gardens and on streets. • Where appropriate, development proposals should promote the use of sustainable modes of transport and work with the Parish council to increase the availability and accessibility of sustainable modes of transport throughout the village. Water Quality – • Development proposals should protect and, where possible, enhance water quality. Light Pollution – • To reduce the impact of light pollution in the Parish, the following areas are recognised as Dark Sky Areas (identified on figure 8): DS1: Land north of the A120 to the northern, eastern and western Parish boundaries; DS2: Land south of the river Blackwater to the southern, eastern and western Parish boundaries. • Development proposals within Dark Sky Areas must demonstrate how they have sought to minimise the occurrence of light pollution. Proposals within Dark Sky Areas which have the potential to detrimentally impact upon biodiversity or visual amenity as a result of an increase in artificial light must demonstrate how the impacts should be adequately mitigated. • Where it is necessary to incorporate external lighting within Dark Sky Areas, development	• Soil stripping and stockpiling and storage of soil • Watercourse crossings • Establishment and use of temporary construction compounds Good practice measures described within the Outline CoCP (document reference 7.2) would be in place during construction. These would safeguard water quality and avoid detrimental impacts to the flow regimes of watercourses. The majority of CSE compounds, temporary construction compounds and substation works are not located near watercourses and other surface waterbodies. Therefore, there are no pathways for potential pollutants arising from construction activities at most locations, for example silted runoff, to reach surface water receptors. Where works near to these receptors cannot be avoided, the magnitude of the potential effects on these watercourses would be reduced through the implementation of the good practice pollution prevention and water quality safeguarding measures. Light Pollution ES Chapter 13: Landscape and Visual (document reference 6.13) presents the assessment of likely significant landscape and visual effects that could result from the Project. Regarding the assessment of

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		proposals should incorporate only well-designed directional lighting. Noise Pollution – • Development proposals which could result in a significant increase in noise pollution should demonstrate the potential impact on the surrounding area and proposed mitigation measures to address the impact. Where appropriate development proposals should include tree planting to provide an additional filter against noise pollution particularly adjacent to busy roads such as the A120. • To reduce the impact of noise pollution in the Parish, the following areas are designated as Tranquil Areas (identified on figure 9): – TA 1: St Peter Ad Vincula Church grounds. – TA 2: PRoW's in the vicinity of Coggeshall Abbey. – TA 3: The Blackwater river corridor west of the village. – TA 4: The Owen Martin Nature Reserve and LWS Bra 206. – TA 5: Rural land in the north west of the Parish. • Development proposals that have the potential to have a significant adverse impact upon Tranquil Areas should demonstrate how they will effectively minimise and mitigate noise pollution. • Development proposals which demonstrate achievement of the highest possible rating	lighting, the Landscape and Visual chapter has been based on the assumptions that: • All works associated with substation - exterior and interior lighting would be provided at the site to allow for safe movement and the operation of equipment. All lighting would be designed in accordance with the appropriate design standards and be motion-sensor activated. • A typical construction day will consist of 12-hours meaning in winter this would require working in the dark at either end of the day. For the purposes of the ES, it is therefore assumed that winter working will require lighting at certain sites but will not be wide scale across the Project. • The Outline CoCP (document reference 7.2) contains relevant good practice measures relating to Landscape and Visual. These measures include LV03: Construction lighting will be directional and minimised where possible. Noise Pollution ES Chapter 14: Noise and Vibration (document reference 6.14) presents the assessment of likely significant noise and vibration effects that could result from the Project.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		under the Home Quality Mark or BREEAM assessment, as appropriate, will be supported.	The Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects. The Outline CoCP (document reference 7.2) contains a list of relevant standard mitigation measures and best practicable means relating to Noise and Vibration. It is concluded the Project accords with noise related policies regarding substations and overhead lines. Noise levels from the overhead lines were scoped out of the noise and vibration assessment of the Project as levels of noise are likely to be low.
	Policy 12 Managing Flood Risk & Drought Mitigation	To reduce the potential for flooding to occur in Coggeshall Parish and to mitigate against drought events, development proposals should: • Not increase flood risk (including fluvial and surface) on site or elsewhere. • Demonstrate that, where necessary, the Sequential Test and Exception Test has been satisfactorily undertaken in accordance with national planning policy. • Where possible, use effective existing or innovative technology, construction and design techniques to reduce the risk of flooding, mitigate any impact of flooding and minimise surface water run-off. • Where ground conditions allow, ensure that sufficient hard external surface areas are	Table 4.2 of ES Chapter 4: Project Description (document reference 6.4) details the embedded measures incorporated into the Project's design. ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) outlines the standard and additional mitigation measures relevant to hydrology, land drainage, and flood risk. These measures will be secured through the Outline CoCP (document reference 7.2). The Outline CoCP (document reference 7.2) will be secured via a Requirement in the Development Consent Order (DCO), which mandates that the Main Works Contractor(s) prepare the CoCP substantially in accordance with the Outline CoCP to satisfy the Requirement.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		permeable or that runoff water is collected by effective infiltration systems. • Where possible, collect and recycle grey water and incorporate water storage measures or 'rainwater harvesting' for high volume rainfall events and to minimise surface run off. • Maximise opportunities to reduce the causes and impact of flooding through appropriate Sustainable Drainage Systems (SuDS). All SuDS proposals should be accompanied by a comprehensive management plan setting out the long-term maintenance and responsibility of SuDS features; and • Where possible include tree and shrub planting to reduce run off, particularly along field boundaries. To manage the potential for flooding throughout the Parish, particularly during high volume rainfall events, the following areas (identified on Figure 10 - Managing Flood Risk & Drought Proposals Plan) are identified as Flood Management Areas where development proposals should demonstrate that flood risk will not be increased overall and that opportunities to reduce flood risk, for example, through the use of sustainable drainage systems and natural flood management, are taken: • FMA1: The site of the BT exchange, East Street • FMA2: Land north and south of the stream adjacent to the Essex Way adjacent to St Peters Road. • FMA3: Land east of the Essex Way.	During construction, the majority of the works would take place outside of the floodplain in Flood Zone 1, where the risk of flooding from rivers is defined as very low. There is the potential for the Project to increase flood risk during construction through the creation of soil stockpiles and temporary works areas, which could result in the temporary loss of floodplain storage or could impede flood flows. The FRA (document reference 7.9) outlines the proposed embedded and good practice measures for where there are locally higher risks, particularly to temporary works within main river floodplains. The measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk. A sequential approach has been applied in selecting the land for the Project and to the layout and design of the infrastructure demonstrating that the Sequential Test has been met. Evidence of passing the Sequential Test and Exception Test is presented in the FRA (document reference 7.9) and Planning Statement (document reference 5.6). No areas of fluvial flood risk are identified within this Neighbourhood Plan Area.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• FMA4: Vicarage Field. • FMA5: The village centre, 'The Gravel' and public highways. • FMA6: Robins Brook and Marks Hall Estate. • FMA7: Land north of the Blackwater on the Dutch Nursery development, West Street. • FMA8: Long Bridge, Bridge Street	
	Policy 13 Protecting and Enhancing our Heritage	Development proposals which may have an impact on designated heritage assets or their setting will be supported where it can be demonstrated that: • The scale and character of the proposal respects the scale and character of the Conservation Area and its setting within the surrounding countryside. • The proposal respects any protected spaces between heritage assets within the Conservation Area and the any protected views into and out of the Conservation Area. • The proposals preserve or enhance the character, appearance, setting, structural stability, and historic features of the relevant heritage asset(s). • There is no loss of views which causes substantial harm to the setting of the relevant heritage asset(s) from the surrounding area. • The proposal will not result in a significant increase in the use of the relevant heritage asset(s) which would harm its character, appearance, setting, structural stability or historic significance; and/or	ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. The Coggeshall Conservation Area is located within this Neighbourhood Plan Area. The setting of this conservation areas was not found to extend into the Order Limits as it has a twin focus on the medieval street plan of Coggeshall and the Blackwater Valley, and these do not interact with the Order Limits. As such the

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• Building materials and finishes preserve or enhance the character, appearance, setting and historic features of the relevant heritage asset(s).	impact on this conservation area was scoped out of the Environmental Assessment. Houchin's Farmhouse is the only Listed Building sited in close proximity to the Project within the Neighbourhood Plan Boundary and the impact on this is considered in the Assessment of Harm to Designated Heritage Assets (document reference 6.11.7). This assessment finds that in there would be a 'Mid Less Than Substantial Harm' on the asset. Where less than substantial harm is identified, this harm should be weighed against the benefits of the proposals. Harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.
	Policy 15 Protected views	Development proposals that protect and/or enhance the following Protected Views (PVs) identified on Figure 11 will be supported: • PV1 Colchester Road: SW. PV2 Cook Field: N&S. PV3 Abbey Mill: N&S. PV4 Mill Race: S. PV5 Essex Way (East): N. PV6 West Street, Co-op: S. PV7 Market Hill: NE & SW. PV8	ES Chapter 13: Landscape and Visual (document reference 6.13) presents the assessment of likely significant landscape and visual effects that could result from the Project. To inform the assessment a number of viewpoints have been identified along the route of the Project.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		Long Bridge, Bridge St: E&W. PV9 Essex Way (West): N. PV10 Essex Way (West): E. PV11 Essex Way (West): SW. PV12 Blackwater river corridor: W. PV13 Public footpath: S. PV14 West Street: S. PV15 Public footpath north-west of the village: N. PV16 Vicarage Field: N. PV17 Marks Hall Rd: SW NW. PV18 Public footpath nr Holfield Grange: S. PV19 Public footpath nr Cuthedge Lane: NW. Where development proposals have the potential to have a significant adverse impact upon one or more Protected Views they should be supported by a visual impact assessment.	Within the Coggeshall Neighbourhood Plan area, the relevant viewpoints for the Project are VP5.13, VP5.14 and VP5.06. Visual receptors are grouped into Visual Receptor Areas (VRAs) based on location, landscape characteristics, and similar views, as shown in ES Figure 13.7: Visual Receptors and Viewpoints (document reference 6.13.F7). VRAs and representative viewpoints were identified through site surveys, desktop analysis, and Neighbourhood Plans. Visual effects of linear developments, like overhead lines, are assessed using representative viewpoints to capture typical views, following GLVIA3 guidelines for a proportionate and focused LVIA. Whilst important views have been considered, individual assessments from each identified location have not been presented in the LVIA.
Feering (3rd January 2023)	Policy 4 – Heritage Assets and Their Settings	Development proposals which may have an impact on designated and non-designated heritage assets or their setting will be supported where it can be demonstrated that: • There is no detrimental impact on the character, appearance, setting, structural stability, and historic features of the heritage asset; • The proposals enhance the character, appearance, setting, structural stability, and historic features of the heritage asset where possible;	ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy,

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• There is no loss of important views of the heritage asset from the surrounding area; • There would not be a significant increase in the use of the heritage asset which would result in detriment to its character, appearance, setting, structural stability, and historic features; and • Building materials and finishes are sympathetic to the character, appearance, setting, and historic features of the heritage asset.	the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. The Feering Conservation Area is located within this Neighbourhood Plan Area. The setting of this conservation areas was not found to extend into the Order Limits as it is internally focused around the historic centre of Feering. As such the impact on this conservation area was scoped out of the Environmental Assessment. Several Listed Buildings are located in close proximity to the Project within the Neighbourhood Plan Boundary. Therefore, the impacts on these assets are considered in the Assessment of Harm to Designated Heritage Assets (document reference 6.11.7). This assessment finds that in the majority of cases there would be a 'Mid Less Than Substantial Harm'. This includes the Grade II* Listed 'Ancillary Building 6 Metres South East of Feeringbury Manor', and Feeringbury Manor itself. Where less than substantial harm is identified, this harm should be weighed against the benefits of the proposals. Harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. This is supported by

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.
	Policy 5 – Local Green Space	The following areas shown in Figure 10 are designated as Local Green Spaces LGS1 Feering Churchyard LGS2 Village Green LGS3 Taylors, Coggeshall Road LGS4 Allotments LGS5 St Martins cemetery LGS6 Playing Field, Rye Mill Lane LGS7 Feering Marsh LGS8 Kelvedon & Feering Cricket Ground LGS9 Cricket Ground extension LGS10 Lady Meadow LGS11 Bridge Meadow and "Packhorse" Bridge LGS12 Bridge Meadow and Feering Hill Green.	An assessment of the impact of the Project on open spaces (including playing fields) is included in the Planning Statement (document reference 5.6). The Project has taken a precautionary approach to the identification of potential open space. The Project has no direct interaction with any of the Green Spaces identified in the Feering Neighbourhood Plan.
	Policy 6 – Natural Environment and Green and Blue Infrastructure	Development proposals will be supported that protect, and where possible, enhance the natural environment. All proposals should seek to deliver biodiversity net gain, in addition to protecting existing habitats & species. • Development proposals will be supported that; • Protect and where possible enhance public open space, Local Green Spaces, local wildlife sites, important features of the natural environment, and the biodiversity of the site and its surroundings; • Ensure improved access to, and / or create new, public open spaces and high-quality	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) assesses the potential impacts of the Project's construction, operation, and maintenance phases on ecological and biodiversity receptors. Habitat connectivity will be preserved where possible by utilising existing access routes, minimising working widths through biodiversity receptors, and maintaining connectivity via green corridors such as hedgerows and watercourses. An assessment of the impact of the Project on open spaces (including green

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		green and blue infrastructure where appropriate; • Improve connectivity between wildlife areas, Local Green Spaces and public open spaces through green corridors and/or improvements to the walking, cycling & horse-riding networks, including Public Rights of Way (Figure 12); • Enhance the visual characteristics and biodiversity of open spaces and green & blue infrastructure in close proximity to the development; • Ensure that landscape schemes, layouts, access and public open space provision and other amenity requirements contribute to the connectivity, maintenance and improvement of the green & blue infrastructure and walking, cycling & horse-riding networks, including Public Rights of Way within the site and beyond; • Incorporate the multi-functional use of open spaces where appropriate as part of the green & blue infrastructure network; • Provide appropriate water management measures. Where possible sustainable urban drainage systems should be multi-functional to deliver benefits for the built, natural and historic environment, including natural flood management techniques; and • All new residential development will be required to make a financial contribution towards mitigation measures, in accordance with the adopted Essex Coast Recreational	and blue infrastructure) is included in the Planning Statement (document reference 5.6). The Project has taken a precautionary approach to the identification of potential open space. The Project would over sail the Coggeshall Farm LWS as identified in the Feering Neighbourhood Plan at a narrow point. It is noted that some tree loss will be required to facilitate safety clearances. Habitats will be reinstated in line with the habitat reinstatement principles within Chapter 9 of the Outline LEMP (document reference 7.4). As no new permanent infrastructure is proposed within the site other than the oversailing of the space with electricity lines, it is not considered that the Project would impact on the function or use of this space.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		disturbance Avoidance and Mitigation Strategy (RAMS) Supplementary Planning Document, to avoid adverse in-combination recreational disturbance effects on European Sites. Development proposals which are likely to have a significant individual or cumulative impact on the Blackwater River Valley or the Langley Green Farmland Plateau Landscape Character Areas should demonstrate how the proposal will protect and enhance the special features and overall character of the area. The future management and maintenance arrangements for new areas of open space SUDs and green infrastructure provided as part of new development should be agreed at the time of planning consent.	
	Policy 9 – Moving Around	Proposals for new development should as appropriate: • Protect the highway network for the safe and efficient movement of people and goods by all modes of travel; • Provide and enhance walking, cycling & horse-riding networks, including Public Rights of Way, (Figure 12) and passenger transport connections within the site and the wider parish, including local services and facilities and Kelvedon Station; • Demonstrate that there is no severe cumulative detrimental impacts on the existing or proposed highway in congestion terms or provide appropriate mitigation measures;	The Outline CTMP (document reference 7.3) provides details of the proposed traffic management of delivery vehicles and other traffic generated during the construction phase at this stage of the Project. It identifies measures designed to avoid and reduce the effect wherever possible between construction site traffic and other road users. The CTMP(s) would be implemented by the Main Works Contractor(s) to ensure that all traffic movements associated with the Project's construction works operate in a compliant manner.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• Not have a severe detrimental impact on air quality and public health as a result of increased traffic flows and congestion; • Create safe and accessible environments for those with mobility impairment; • Make provisions for parking which have regard to the Essex Parking Standards (2009) or subsequent amendments: and • Include evidence of engagement with rail and bus providers to ensure adequate provision of services to meet the needs of new development. Proposals for employment generating development should also as appropriate; • Ensure good access to the A12; • Ensure good access to the new and improved A120 when delivered; • Ensure good quality pedestrian and cycle access to Kelvedon Station; • Avoid significantly increasing traffic flows through the village; • Where new and improved infrastructure is provided it should make adequate provision for safe crossing points and corridors for wildlife and equestrian use.	
	Policy 12 – Climate Change and Sustainability	Proposals for community owned or led renewable energy schemes (including micro- hydro, photovoltaic or bio-mass projects) will be supported subject to the following criteria for the proposed development:	With specific reference to Part B of Policy 12, the application for development consent is accompanied by an Environmental Statement which provides the final assessment of likely significant effects, associated with the Project during

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• The siting and scale are appropriate to its setting and position in the wider landscape; • It does not give rise to unacceptable landscape or visual impact, either in isolation or cumulatively with other development; • It does not create an unacceptable impact on the amenities of local residents; • It does not have an unacceptable impact on a feature of natural or biodiversity importance. Development proposals are supported that clearly demonstrate the potential risks to the human and natural environment, and how those risks will be adequately addressed by appropriate avoidance, alleviation and mitigation measures. For example, the plan supports development proposals that seek to undertake the following as part of their planning application: • An environment statement; • Air quality assessments and detail any mitigation measures required; • Drainage and flood mitigation assessment and strategy; • Sustainable drainage systems which manage the risk of flooding; • Landscape management plan which details deciduous and evergreen planting in public spaces, private and shared gardens and on streets to improve air quality and reduce water run-off; • Noise pollution assessment and mitigation strategy;	its construction and operation. This includes an assessment of the likely significant effects on: Air Quality The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. Measures to control air quality emissions during construction are set out in the Outline CoCP (document reference 7.2) as secured by a Requirement in the Development Consent Order. Drainage and Flood Risk ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) presents the assessment of likely significant water effects that could result from the Project. An FRA (document reference 7.9) has also been prepared to support the application for development consent. The FRA documents the assessment taken to understand whether the Project is likely to be at risk of flooding or is likely to increase flood risk elsewhere in accordance with the requirements set out in relevant national policy. The Project oversails the River Blackwater within the Feering Neighbourhood Plan

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• Water pollution assessment and mitigation strategy. Development proposals are supported that use renewable energy sources and sustainable transport links. Development proposals are supported that reduces the impact of light pollution in the Parish. Development proposals are supported that incorporate grey water recycling measures	Area between pylons TB78 and TB79. Pylon TB79 is sited within the area at risk of flooding. Pylons are resilient to fluvial flooding given their open, metal lattice structure and as the overhead lines carried by the pylons are significantly higher than anticipated flood depths. If the bases of the pylons were flooded the Project would still be able to remain operational. The requirements for compensation of loss of floodplain storage associated with the pylons are set out in the Flood Risk Assessment (document reference 7.9) and will be secured by commitment W17 in the Outline CoCP (document reference 7.2). The FRA concludes that with respect to surface water flooding, during construction and operation, the Project is considered to be largely at low risk, with some areas at higher risk. Measures would be in place to manage surface water runoff and minimise impacts on the land drainage regime across the Project, including allowances for climate change resilience within the designs of operational SuDS. Landscape and Visual Impact Within the Feering Neighbourhood Plan area, the relevant viewpoints for the Project include VP5.02 and VP5.03. Visual receptors are grouped into Visual Receptor Areas (VRAs) based on location, landscape characteristics, and similar views, as shown in ES Figure 13.7: Visual

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			Receptors and Viewpoints (document reference 6.13.F7). VRAs and representative viewpoints were identified through site surveys, desktop analysis, and Neighbourhood Plans. Visual effects of linear developments, like overhead lines, are assessed using representative viewpoints to capture typical views, following GLVIA3 guidelines for a proportionate and focused LVIA. Whilst important views have been considered, individual assessments from each identified location have not been presented in the LVIA. Landscape Management As set out in the Biodiversity Net Gain Report (document reference 7.1) National Grid is committed to deliver a minimum of 10% Biodiversity Net Gain. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once re-established. Noise Pollution: ES Chapter 14: Noise and Vibration (Document Reference 6.14) presents the assessment of likely significant noise and vibration effects that could result from the Project.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			The Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects. The Outline CoCP (document reference 7.2) contains a list of relevant standard mitigation measures and best practicable means relating to Noise and Vibration. It is concluded the Project accords with noise related policies regarding substations and overhead lines. Noise levels from the overhead lines were scoped out of the noise and vibration assessment of the Project as levels of noise are likely to be low. Water Quality: ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) presents the assessment of likely significant water effects that could result from the Project. The construction of the Project has the potential to impact on water quality and resources associated with: • Soil stripping and stockpiling and storage of soil • Watercourse crossings • Establishment and use of temporary construction compounds Good practice measures described within the Outline CoCP (document reference 7.2) would be in place during construction.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			These would safeguard water quality and avoid detrimental impacts to the flow regimes of watercourses. Light Pollution ES Chapter 13: Landscape and Visual (document reference 6.13) presents the assessment of likely significant landscape and visual effects that could result from the Project. Regarding the assessment of lighting, the Landscape and Visual chapter has been based on the assumptions that: All works associated with substation - exterior and interior lighting would be provided at the site to allow for safe movement and the operation of equipment. All lighting would be designed in accordance with the appropriate design standards and be motion-sensor activated. A typical construction day will consist of 12-hours meaning in winter this would require working in the dark at either end of the day. For the purposes of the ES, it is therefore assumed that winter working will require lighting at certain sites but will not be wide scale across the Project. The Outline CoCP (document reference 7.2) contains relevant good practice measures relating to Landscape and Visual. These measures include LV03: Construction lighting will be directional and minimised where possible.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
Kelvedon (25th July 2022)	Policy HE 3 – Non-Designated Heritage Assets	Development proposals should respect, and, where possible, enhance the setting, character and appearance of non-designated assets within the Neighbourhood Plan area. Where possible, and subject to viability considerations, non-designated Heritage Assets should be used to reinforce local distinctiveness and contribute to the social and economic well-being of the area.	National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets.
	Policy NE 1 – Existing Public Open Space	Development proposals should retain existing public open spaces within and adjacent to the villages (Map 6).	An assessment of the impact of the Project on Open Spaces is included in the Planning Statement (document reference 5.6). The Project has taken a precautionary approach to the identification of potential open space. The Project has no direct interaction or would result in the loss or material impact on any of the public open spaces identified in the Kelvedon Neighbourhood Plan.
	Policy NE 3 – Protection of Green Infrastructure and Biodiversity	All development proposals should seek to maintain and enhance green infrastructure and biodiversity and should, wherever possible, provide net gains for biodiversity. Major housing and other development proposals which are likely to have a significant direct or indirect adverse impact on green infrastructure, local biodiversity, priority habitat, wildlife of a Local Nature Reserve or protected species should be supported by evidence that demonstrates that:	An assessment of the impact of the Project on Open Spaces is included in the Planning Statement (document reference 5.6). As defined in EN-1 open space also includes green and blue infrastructure. The Project has taken a precautionary approach to the identification of potential open space in accordance and to this extent Porters Farm has been identified as an area of potential green infrastructure. In crossing Porters Farm it will be necessary

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• there are no alternatives with less harmful impacts, or: • that appropriate mitigation measures or, as a last resort, compensation measures, can be provided to achieve measurable net gains to the site's biodiversity. Major housing and other development proposals which may result in the loss of bird nesting habitat, must include, by way of mitigation within the new development, suitable alternative nesting habitat. Development proposals should seek to maintain and enhance green and blue infrastructure such as native hedgerows, trees, ditches and water bodies and where possible, increase their connectivity to allow the freedom of movement for species on or through the site. Planning applications for new dwellings should clearly demonstrate how they have incorporated appropriate measures to secure the connectivity of the multi-functional green Infrastructure and wildlife corridors.	to remove existing broadleaved woodland planting which will be replaced by mixed scrub. It is not considered that the oversail of Porter's Farm would impact on its use as a secure private dog training area.
	Policy NE 4 – Designation of Local Green Spaces	The Plan designates the following as Local Green Spaces shown on Map 7 where inappropriate development will not be approved except in very special circumstances: 1. Glebe Road Play Space 2. Thorne Road 3. Brockwell Lane 4. Scout hut 5. Footpath link from Brockwell Meadows to Riverside Way 6. Teal Way 7. Curlew Close - Heron Road 8. Kingfisher Way 9. Swan Street 10. High Street 11. Church Road.	National Grid has noted the 11 Local Green Spaces identified within the Kelvedon Neighbourhood Plan. The Project has no direct interaction with any of the identified Green Spaces.
	Policy NE 5 – Protection of	Development proposals should where appropriate, demonstrate how they have taken account of the	ES Chapter 13: Landscape and Visual (document reference 6.13) presents the

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
	Indicative Key Views	indicative Key Views identified on Map 8 and detailed in Volume 2 Appendix D. In particular, development proposals should set out details on how they take account of the indicative key views, by way of their scale, height, position within the application site, the use of materials and external lighting. Any development or alterations within these indicative views should ensure that key features of the view can continue to be enjoyed, including distant buildings, areas of landscape and the juxtaposition of the village's edges and open agricultural countryside.	assessment of likely significant landscape and visual effects that could result from the Project. To inform the assessment a number of viewpoints have been identified along the route of the Project. Within the Kelvedon Neighbourhood Plan area, the relevant viewpoints for the Project are VP5.18 and VP5.21. Visual receptors are grouped into Visual Receptor Areas (VRAs) based on location, landscape characteristics, and similar views, as shown in ES Figure 13.7: Visual Receptors and Viewpoints (document reference 6.13.F7). VRAs and representative viewpoints were identified through site surveys, desktop analysis, and Neighbourhood Plans. Visual effects of linear developments, like overhead lines, are assessed using representative viewpoints to capture typical views, following GLVIA3 guidelines for a proportionate and focused LVIA. Whilst important views have been considered, individual assessments from each identified location have not been presented in the LVIA.
	Policy NE 7 - Pollution	Development proposals should avoid any significant increase in air, land, water, odour, noise, or light pollution to a level which could detrimentally impact upon the health, quality of life, and residential amenity of existing and future residents.	The application is accompanied by an Environmental Statement which provides the final assessment of likely significant effects, associated with the Project during its construction and operation. Air Quality, dust and odour

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		Where there is potential for significant pollution to derive from new development, the proposals should clearly demonstrate the potential risks to the human and natural environment, and how the risks will be adequately addressed by appropriate avoidance, alleviation and mitigation measures. Air quality, dust and odour • New development proposals which could have an adverse impact upon local air quality must mitigate significant impacts and be in accordance with up-to-date guidance issued by the Institute of Air Quality Management. • New development proposals should promote the use of deciduous and evergreen planting in public spaces, private gardens and on streets, with a preference for locally dominant native species. • New development proposals should promote the use of sustainable modes of transport to increase the availability and accessibility of sustainable modes of transport throughout the village. Water quality, abstraction and temperature fluctuation • New development proposals should avoid significant detrimental impacts on water quality or a significant rise in temperature levels within waterways. Light Pollution • To reduce the impact of light pollution in the Parish, the following area is recognised as a Dark Sky area (identified on Map 9):	The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. As is standard practice in the construction industry, good practice measures would be put in place to control dust emissions at source and to manage or reduce the release of dust beyond the boundaries of the construction areas. The good practice measures are set out in the Outline CoCP Appendix D: Outline Dust Management Plan (document reference 7.2). As identified in the Statement of Statutory Nuisance (document reference 5.4) it is not anticipated that construction activities would give rise to any material amounts of steam, smell or other effluvia. Water Quality: ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) presents the assessment of likely significant water effects that could result from the Project. The construction of the Project has the potential to impact on water quality and resources associated with: • Soil stripping and stockpiling and storage of soil • Watercourse crossings

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• DS1: Land to the north, north-west and west of the Village to the parish boundary. • New development proposals should avoid artificial light levels which cause a significant increase in light pollution in the Dark Sky Area. • Development proposals within the Dark Sky Area should demonstrate how the impacts of artificial light will be mitigated within the proposed scheme and must not result in an increase of light pollution including by ensuring well-designed directional lighting is only used where necessary. Noise Pollution • Development proposals which could result in a significant increase in noise pollution should demonstrate the potential impact on the surrounding area and proposed mitigation measures to address these impacts.	• Establishment and use of temporary construction compounds Good practice measures described within the Outline CoCP (document reference 7.2) would be in place during construction. These would safeguard water quality and avoid detrimental impacts to the flow regimes of watercourses. The majority of CSE compounds, temporary construction compounds and substation works are not located near watercourses and other surface waterbodies. Therefore, there are no pathways for potential pollutants arising from construction activities at most locations, for example silted runoff, to reach surface water receptors. Where works near to these receptors cannot be avoided, the magnitude of the potential effects on these watercourses would be reduced through the implementation of the good practice pollution prevention and water quality safeguarding measures. Light Pollution ES Chapter 13: Landscape and Visual (document reference 6.13) presents the assessment of likely significant landscape and visual effects that could result from the Project. Regarding the assessment of lighting, the Landscape and Visual chapter has been based on the assumptions that: • All works associated with substation - exterior and interior lighting would be

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			provided at the site to allow for safe movement and the operation of equipment. All lighting would be designed in accordance with the appropriate design standards and be motion-sensor activated. • A typical construction day will consist of 12-hours meaning in winter this would require working in the dark at either end of the day. For the purposes of the ES, it is therefore assumed that winter working will require lighting at certain sites but will not be wide scale across the Project. • The Outline CoCP (document reference 7.2) contains relevant good practice measures relating to Landscape and Visual. These measures include LV03: Construction lighting will be directional and minimised where possible. Noise Pollution ES Chapter 14: Noise and Vibration (document reference 6.14) presents the assessment of likely significant noise and vibration effects that could result from the Project. The Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects. The Outline CoCP (document reference 7.2) contains a list of relevant standard

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			mitigation measures and best practicable means relating to Noise and Vibration. It is concluded the Project accords with noise related policies regarding substations and overhead lines. Noise levels from the overhead lines were scoped out of the noise and vibration assessment of the Project as levels of noise are likely to be low.
	Policy NE 8 – Flood Prevention	New development which reduces flood risk will be supported, including measures to: • Provide natural flood and water management, such as swales and rain gardens, which integrates with the streetscape, • Provide multi-functional attenuation basins that support blue and green infrastructure and contribute positively to the landscape, • Use permeable paving wherever appropriate, • Collect and re-use grey water, and • Provide long term management and maintenance of sustainable urban drainage systems where included.	ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) outlines the standard and additional mitigation measures relevant to hydrology, land drainage, and flood risk. These measures will be secured through the Outline CoCP (document reference 7.2). The Outline CoCP (document reference 7.2) will be secured via a Requirement in the Development Consent Order (DCO), which mandates that the Main Works Contractor(s) prepare the CoCP substantially in accordance with the Outline CoCP to satisfy the Requirement. During construction, the majority of the works would take place outside of the floodplain in Flood Zone 1, where the risk of flooding from rivers is defined as very low. There is the potential for the Project to increase flood risk during construction through the creation of soil stockpiles and temporary works areas, which could result in the temporary loss of floodplain storage or could impede flood flows.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			The FRA (document reference 7.9) outlines the proposed embedded and good practice measures for where there are locally higher risks, particularly to temporary works within main river floodplains. The measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk. A sequential approach has been applied in selecting the land for the Project and to the layout and design of the infrastructure demonstrating that the Sequential Test has been met. Evidence of passing the Sequential Test and Exception Test is presented in the FRA (document reference 7.9) and Planning Statement (document reference 5.6).
Cressing (17th February 2020)	Policy 1 – Protecting and Enhancing the Natural Environment	Development proposals should protect, and where possible, enhance the natural environment. All proposals should seek to deliver net environmental and biodiversity gains, in addition to protecting existing habitats and species. Any proposals which negatively affect, or have the potential to negatively affect, the natural environment must demonstrate that any negative impacts on biodiversity, including flora and fauna, and local wildlife (including wildlife habitats), will be adequately mitigated and/or offset. The following natural environment features are identified within Figure 5: • Sheepcoate Wood Wildlife Site (Bra 133)	The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. The Project does not directly interact with the three local wildlife sites or two areas of common land identified in the Cressing Neighbourhood Plan.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• Langham Wood Local Wildlife Site (Bra 123) • Stream Wood Local Wildlife Site (Bra 107) • Common Land near Deans Farm (CL 426) • Lanham Green Common Land (CL 412) Development proposals which are likely to have a negative impact upon these features should demonstrate the benefits of development clearly outweigh any negative impacts to the nature conservation value of the feature, or to its contribution to wider biodiversity objectives. Development proposals which deliver the creation of wildlife corridors within the Parish and beyond, and encourage the improved management of agricultural land for the benefit of the environment will be supported.	
	Policy 2 – Protection of Special and Sensitive Landscapes	Development proposals likely to have a significant impact on either the Brain Valley or the Silver End Farmland Plateau Landscape Character Areas identified within Figure 5 should demonstrate that the proposal will: • protect and enhance the special features and the overall character of the Landscape Character Area; • protect and where possible improve access to open countryside within the Landscape Character Area for recreation; and • protect and enhance the biodiversity of the natural environment within the Landscape Character Area.	ES Chapter 13: Landscape and Visual (document reference 6.13) presents the assessment of likely significant landscape and visual effects that could result from the Project. ES Appendix 13.2: Landscape Baseline and Assessment (document reference 6.13.A2) includes an assessment includes an assessment of the effects of the Project on Landscape Character. Within the Cressing Neighbourhood Plan area, the relevant viewpoints for the Project are VP5.11. Visual receptors are grouped into Visual Receptor Areas (VRAs) based on location, landscape characteristics, and similar views, as shown in ES Figure 13.7: Visual

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			Receptors and Viewpoints (document reference 6.13.F7). VRAs and representative viewpoints were identified through site surveys, desktop analysis, and Neighbourhood Plans. Visual effects of linear developments, like overhead lines, are assessed using representative viewpoints to capture typical views, following GLVIA3 guidelines for a proportionate and focused LVIA. Whilst important views have been considered, individual assessments from each identified location have not been presented in the LVIA. Silver End is identified as being part of the East of England Woodland Plateau Farmlands LCT and this LCT would be directly affected by the Project.
	Policy 3 – Maintaining the Character and Integrity of the Parish	An Open Countryside Buffer Area is defined as identified in Figure 5. Proposals for development in the Open Countryside Buffer Area should demonstrate than they will: • enhance the rural character and appearance of Cressing Parish; • maintain and enhance the physical gap in development between the urban fringe of Braintree and settlements within Cressing Parish and; • are of a scale, massing, and visual appearance which will not detrimentally impact upon the rural character and appearance of	The Project is located outside of the Open Countryside Buffer Area. It is considered that the Project does not interact with this policy.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		Cressing Parish, including the setting of Tye Green and Cressing village; Any development in the Open Countryside Buffer Area associated with new strategic infrastructure should provide significant benefits to the wider area and seek to mitigate any detrimental impacts on the character and appearance of the Open Countryside Buffer Area. Any proposals for development in the Open Countryside Buffer Area identified within Figure 5 should include a visual impact assessment, clearly outlining the impact of development on the character and appearance of the surrounding area, and demonstrating the impact of the development and proposed mitigation measures on views from the Parish including Tye Green and Cressing village. Development proposals located outside of settlement boundaries, or adjacent to settlement boundaries, should demonstrate how they will maintain clear separation and avoid any potential coalescence between settlements within the Parish and adjoining Parishes. This could include the use of additional green infrastructure features.	
	Policy 4 – Protecting the Historic Environment	Development proposals will be supported which protect, and where appropriate enhance, heritage assets in the Parish including designated and non-designated heritage features, archaeological sites, listed buildings, historic landscapes, Protected Lanes, and the designated Conservation Area in the village of Cressing. Development proposals which may have an impact on heritage assets or	ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the likely significant cultural heritage effects that could result from the Project. There are several listed buildings located within the Neighbourhood Plan Area, including the Grade I listed 'The Wheat Barn, 35 Metres North East of Cressing

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		their setting will be supported where it can be demonstrated that: • There is no detrimental impact on the character, appearance, setting, structural stability, and historic features of the heritage asset; • The proposals enhance the character, appearance, setting, structural stability, and historic features of the heritage asset where possible; • There is no loss of important views of the heritage asset from the surrounding area; • There would not be a significant increase in the use of the heritage asset which would result in detriment to its character, appearance, setting, structural stability, and historic features; • The benefits of the proposed development would clearly and convincingly justify any identified harm to the character, appearance, setting, and historic features of the heritage asset, taking into account the significance of the heritage asset in accordance with the requirements of the NPPF; and • Building materials and finishes are sympathetic to the character, appearance, setting, and historic features of the heritage asset Any proposals for development which could impact upon a heritage asset within the Parish should submit a Heritage Statement in support of the application, outlining the significance of the heritage asset and its setting and how the	Temple Farmhouse', which is surrounded by a complex of other Listed Buildings, which are located to the north of the Order Limits. The Grade II listed Hungry Hall Farmhouse is located within 50 metres of the Order Limits. The Cressing Conservation Area is outside of the Historic Environment Study Area. The impacts on these assets and others nearby are considered in the Assessment of Harm to Designated Heritage Assets (document reference 6.11.7). This assessment finds a Mid Less Than Substantial Harm on the Hungry Hall Farm House and Lower Less Than Substantial Harm on all other assets. Where less than substantial harm is identified, this harm should be weighed against the benefits of the proposals. Harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		proposed development will meet the above requirements of this policy. Any development which could result in harm to a designated or non-designated heritage asset will only be considered acceptable where a Heritage Statement clearly and convincingly justifies any harm. Any proposals which could impact upon important archaeological remains should submit the outcomes of an archaeological evaluation of the site as part of the application, providing a proportionate assessment of the character, importance and extent of the archaeological remains.	character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets.
	Policy 6 – Protecting and Enhancing Community Facilities and Public Open Space	Where appropriate, development proposals will be required to contribute towards the provision of public open space, community facilities, projects and initiatives within the Parish which specifically address the needs and aspirations of local residents, in accordance with CPNP Policy 11. Developer contributions will be sought towards a range of specific projects which address local needs, including: • The provision of a new community hall; • Funding to support new community clubs; • New community notice boards; • Expansion and modification of the playing fields and equipment at Jeffrys Road; • Improvements at Rainbow Field; and • Implementing a Churchyard Management Plan at All Saints Church to reinstate the Essex	As stated in the Planning Statement (document reference 5.6), the Project has taken a precautionary approach to the identification of potential open space. The Project has no direct interaction or would result in the loss or material impact on any of the Open Space, Sport and Recreation Facilities identified in the Cressing Neighbourhood Plan.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		Wildlife Sanctuary in appropriate areas of the churchyard. Development proposals which would result in the net loss of existing community facilities or public open space will need to provide demonstrable benefits which outweigh the harm created by the loss, or the community facility is replaced by better provision. All developments providing community assets and open spaces should where possible ensure that they are not designed as single purpose use, and deliver multiple functions and benefits. Development proposals should integrate with the current green infrastructure network, seeking to improve the connectivity between wildlife areas and green spaces through measures such as improving and extending the existing footpath and cycle path network, allowing greater access to housing, schools, work places and retail facilities, green spaces, public open spaces and the countryside.	
Witham Neighbourhood Plan	A Neighbourhood Area application was submitted to Braintree District Council by Witham Town Council on 3rd August 2022 which includes the 4 Wards of Witham North, Witham Central, Witham South and Witham West under The Neighbourhood Planning (General) Regulations (2012) as amended.		
Section F			
Broomfield Neighbourhood Plan	Policy BFD2: Protecting Broomfield's Landscape Character	Proposals for development outside the Settlement Boundary should be accompanied by a Landscape Visual Impact Assessment or other appropriate evidence proportionate to the scale of the proposal, that demonstrates how the proposal: • can be accommodated in the countryside without having a significant detrimental impact,	The application is accompanied by an Environmental Statement which provides the final assessment of likely significant effects, associated with the Project during its construction and operation. ES Chapter 13: Landscape and Visual (document reference 6.13) presents the

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		by reason of the development's scale, materials and location, on the character and appearance of the countryside and its tranquillity and distinction from the main built-up areas; and • conserves and enhances the unique landscape and scenic beauty within the Parish, having regard to the Neighbourhood Plan Landscape Appraisal and Neighbourhood Plan Review of Local Green Space, Valued Landscape and Key Views and the Valued Landscape identified on Map 5 and Important Views on Map 6.	assessment of likely significant landscape and visual effects that could result from the Project. ES Appendix 13.2: Landscape Baseline and Assessment (document reference 6.13.A2) includes an assessment includes an assessment of the effects of the Project on Landscape Character. Within the Broomfield Neighbourhood Plan area, the relevant viewpoint for the Project is VP6.14. Visual receptors are grouped into Visual Receptor Areas (VRAs) based on location, landscape characteristics, and similar views, as shown in ES Figure 13.7: Visual Receptors and Viewpoints (document reference 6.13.F7). VRAs and representative viewpoints were identified through site surveys, desktop analysis, and Neighbourhood Plans. Visual effects of linear developments, like overhead lines, are assessed using representative viewpoints to capture typical views, following GLVIA3 guidelines for a proportionate and focused LVIA. Whilst important views have been considered, individual assessments from each identified location have not been presented in the LVIA. Within Broomfield the Protect is identified as being within the Chelmer LCA and Central Essex Farmland LCA. The assessment of effects on landscape character concludes that there would be significant effects on landscape character

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			within the Central Essex Farmland LCA and Chelmer Valley LCA. Significant effects would occur up to approximately 1 km from the Project.
	Policy BFD4: Trees, Woodland and Hedgerows	Development proposals should avoid the loss of, or substantial harm to, important trees, woodland and hedgerows. Where such losses or harm are unavoidable: i. the public benefits of the development proposal must be demonstrated to clearly outweigh any harm; and ii. suitable mitigation measures, which may include equivalent or better replacement using native species, will be required. Where a new access is created, or an existing access is widened, through an existing hedgerow, replacement hedgerow of native species shall be planted a minimum of 1m behind the visibility splays to maintain the appearance and continuity of hedgerows in the vicinity. Wherever practicable, the planting of additional trees and boundary hedges within development proposals should incorporate native species. As appropriate to their scale, nature and location, development proposals which adjoin the Rural Area, should incorporate new woodland on its rural boundaries designed to mitigate visual impact, reduce noise and light pollution, create and connect wildlife habitats, and provide opportunities for walking and leisure.	The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. ES Chapter 8: Ecology and Biodiversity (document reference 6.8) assesses the potential impacts of the Project's construction, operation, and maintenance phases on ecological and biodiversity receptors. Assessment related to vegetation loss assessment is based on the vegetation clearance assumptions set out in ES Chapter 4: Project Description (document reference 6.4) and presented on the Trees and Hedgerows to be Removed and or Managed Plans (document reference 2.16). As set out in the Biodiversity Net Gain Report (document reference 7.1) National Grid is committed to deliver a minimum of 10% Biodiversity Net Gain. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			and continuous hedgerows, once reestablished.
	Policy BFD5: Protecting the Highest Grade Agricultural Land	Where development is proposed on Grade 2 agricultural land, as defined in the Natural England Agricultural Land Classification Maps, and outside the Broomfield Settlement Boundary or Chelmsford Urban Area Boundary, proposals will be supported where they are: i. replacements for existing buildings or structures; or ii. previously developed land; or iii. essential to support an existing agriculture, forestry, equestrian or other land-based rural business; and iv. supported by evidence, to the satisfaction of the Local Planning Authority, that the proposed development cannot reasonably be accommodated on land other than Grade 2 agricultural land.	ES Chapter 6: Agriculture and Soils (document reference 6.6) presents the assessment of likely significant effects that could result from the Project on soils, agricultural land and agricultural landholdings. The ES chapter is accompanied by ES Figure 6.2: Provisional Agricultural Land Classification (ALC) Mapping (document reference 6.6.F2) and ES Figure 6.3: Detailed Agricultural Land Classification (ALC) Mapping (document reference 6.6.F3) which illustrate that within the Broomfield Neighbourhood Plan area the Project is routed around Grade 2 and 3a agricultural land (70% of the Project through Chelmsford is routed across Grade 2 or 3a agricultural land). During operation (and maintenance), there would be a permanent loss of areas of agricultural land required for permanent infrastructure. By the end of construction, all land required temporarily would be reinstated, and effects on agricultural operations during the construction phase would be managed through compensation agreements (which lie outside of the EIA process). The implementation of good practice measures would ensure that disruption is minimised, and combined with reinstatement and compensation

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			agreements, it is therefore considered that the effects on agricultural landholdings would result in a neutral effect and would not be significant.
	Policy BFD7: Local Green Spaces	The following Local Green Spaces are designated in the Plan and identified on the Policies Map. Management of development within the Local Green Spaces will be consistent with national policy on the management of development in Green Belts. a. Newland Grove Nature Reserve and adjoining land (1) b. Centenary Wood (7) c. Roselawn Play Area (8) d. Vellacotts Green (9) e. Scot's Green (13) f. Play area/linear landscape at Cowlin Mead and Oat Leys (14) g. Daffy Wood (16) h. Night Pasture and Broom Pightle (18) i. Old Church Avenue Playground (19) j. Church Avenue open space and grass verges (20) k. Open space between Mandeville Way and Court Road (22) l. Linear green space and woodland south of Nash Drive (23) m. Long Shapely Belt (24)	A review of the Local Green Spaces identified in the Broomfield Neighbourhood Plan have been reviewed. The Project does not interact with any of the spaces listed.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		n. Puddings Wood (26) (excluding the section where planning consent has already been granted for the proposed new access road) o. Open space to the north of Hospital Approach, at Petty Croft (n/a)	
	Policy BFD11: Development Design Considerations	In addition to the requirements of the adopted Chelmsford Local Plan, development proposals should demonstrate how the proposal reflects the character and setting of Broomfield and the locality within which the site is located. As appropriate to their scale, nature, and location, development proposals should demonstrate how they have regard to the Essex Design Guide and the Broomfield Neighbourhood Plan Design Guidelines (April 2020) and the requirements of the Development Design Checklist in Appendix 2 of this Plan. In particular, applications should demonstrate how they comply with the following principles: i. Size and heights of the buildings should be sympathetic with the surroundings and the wider landscape; ii. Traditional materials should be used for exterior walls and roofs, e.g., Essex or London stock brick, plain or pargetted rendering, flint, decorative brick coursing; iii. Boundary treatments, including fencing, should be complementary to neighbouring buildings and boundary features;	The Design Development Report (document reference 5.15), Design and Access Statement (document reference 7.15), Design Approach for Site Specific infrastructure (document reference 7.16) Chapter 5 of the Planning Statement (document reference 5.6) explains how good design has been embedded in the Project from the outset. The design for the Project is set out in detail in ES Chapter 4: Project Description (document reference 6.4), which describes the design submitted within the application. This should be read alongside ES Chapter 3: Alternatives (document reference 6.3), which documents the key environmental factors that were considered in the optioneering and design evolution process. The design considerations reflect National Grid's duty to be economical and efficient, as well as within the rigorous health and safety processes that National Grid has in place which govern how National Grid designs and constructs their projects safely. The Design Development Report (document reference 5.15), Design and Access Statement (document reference

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		iv. Where public green spaces are provided within a development, they should be designed for a specific purpose (e.g. play areas); and v. Cycling should be encouraged by introducing cycle routes (cycle paths) and providing bicycle parking and storage where appropriate.	7.15) and Design Approach for Site Specific infrastructure (document reference 7.16) summarises the different choices made during the design process. As set out in the Biodiversity Net Gain Report (document reference 7.1) National Grid is committed to deliver a minimum of 10% Biodiversity Net Gain. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once re-established.
	Policy BFD13: Special Character Areas	Three areas at Angel Green/Broomfield Place, Parsonage Green and Broomfield Mill (Mill Lane), as identified on the Policies Map, are designated as Special Character Areas. Development proposals in these areas will be supported where it can be demonstrated that: i. The siting, design and scale would preserve or enhance the character and appearance (listed in Appendix 4) of the Special Character Area; and ii. Building materials and finishes are appropriate to the local context; and iii. Features which contribute to the character of the area are retained; and iv. Important views are preserved; and v. Significant open spaces are protected, where appropriate; and vi. The setting and significance of any heritage assets are protected in accordance with Local Plan policy. In addition to the above criteria, development will be supported where: a. Angel	National Grid has identified the Special Character Areas identified in the Broomfield Neighbourhood Plan. The Project does not interact with Angel Green/Broomfield Place, Parsonage Green and Broomfield Mill (Mill Lane) Special Character Areas.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		Green i. The alignment of any new structures respect the shape of the Green and avoid overshadowing it; and ii. The relationship between historic buildings and the Green is respected; and iii. The relationship between historic buildings and other prominent lawns/grassland is respected. b. Parsonage Green i. New buildings are set back from the Green to conserve the sense of openness; and ii. The sense of transition between the Green and the wider countryside to the west is conserved. c. Broomfield Mill i. boundary treatments respect the existing features of traditional brick, small hedges, brick walls and wooden fences/gates.	
	Policy BFD15: Public Rights of Way	Development proposals shall safeguard all public rights identified on the Definitive Rights of Way Map including footpaths, bridleways, and byways, and where possible, informal routes on green lanes, unclassified county roads, and local paths. Development proposals will not be supported which: i. adversely affect any existing public right of way or informal route, and the public's enjoyment of it; or ii. detract from the character of any existing right of way or informal route, including the urbanisation of it; or iii. do not accord with the need to improve and provide access to the countryside for the disabled. Development proposals that would result in the diversion of the route of an existing right of way	Within Broomfield, there will be a requirement to temporarily close and divert public rights of way, with the maximum impact being for 15 weeks on two public rights of way. Details of the strategy for PRoWs and the management regimes can be found within the Outline PRoW Management Plan (document reference 7.6). The following PRoW within Broomfield are identified as being subject to management (e.g. temporary closure and diversion or temporary closure (managed): • Broomfield 1 (Part of Saffron Trail) • Broomfield 3 • Broomfield 4 • Broomfield 31 • Broomfield 9

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		will only be supported in exceptional circumstances.	• Broomfield 5 (Part of Pleshey and Great Waltham Loop) Details of the strategy for PRoWs and the management regimes can be found within the Outline PRoW Management Plan (document reference 7.6).
Writtle (8 December 2021)	Policy WNP D1: High Quality Design	New development in the parish of Writtle which contributes to the creation of high-quality places through a design-led approach to development underpinned by good practice principles and reflecting a thorough site appraisal will be supported. Development proposals which have regard to guidance and best practice principles established in the Essex Design Guide, the Chelmsford Local Plan, the Making Places SPD and the guidance and relevant codes established in the Writtle Design Guide, including those summarised in Table 1 and Appendix 1 of the Neighbourhood Plan will also be supported. Development proposals that have regard to the key features of each character area (Figure 4) set out in Table 2, and local design cues, and which demonstrate an imaginative sense of place whilst respecting the surrounding context, are welcome. The design and standard of any new development should aim to meet a high level of sustainable design and construction and be optimised for energy efficiency, targeting zero carbon emissions. Innovative approaches to construction of low carbon homes, including construction to Passivhaus standards, are strongly encouraged where development also complies with other policies of the Development Plan.	The application is accompanied by an Environmental Statement which provides the final assessment of likely significant effects, associated with the Project during its construction and operation. The design for the Project is set out in detail in ES Chapter 4: Project Description (document reference 6.4), which describes the design submitted within the application. This should be read alongside ES Chapter 3: Alternatives (document reference 6.3), which documents the key environmental factors that were considered in the optioneering and design evolution process. The Design Development Report (document reference 5.15), Design and Access Statement (document reference 7.15), Design Approach for Site Specific infrastructure (document reference 7.16) Chapter 5 of the Planning Statement (document reference 5.6) explains how good design has been embedded in the Project from the outset again the ‘criteria for good design for Energy Infrastructure’ contained in Part 4.7 of EN-1.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		Encouragement is given to development proposals that accord with the City Council's Livewell Accreditation Scheme. • Development proposals in the Writtle neighbourhood development area will be supported which, where appropriate: have regard to the historic settlement pattern and makes use of materials present within the built environment that complement Writtle's character as set out in Table 3; • strengthens the verdant character of Writtle by retaining existing trees and incorporating open space in line with appropriate standards of provision, in accordance with the Chelmsford Local Plan; • uses boundary treatments that complement the street scene, rural character of the village and landscape setting, as set out in Tables 2 and 3; • minimises visual intrusion through the appropriate scale, design and siting of development, and through the planting of trees and hedgerows native to Writtle, including deciduous broad-leafed trees; • reflects the prevailing building height in the character area within which it is located, as set out in Table 2, and retains views of the Church Spire; • includes off-street parking wherever possible, combined with landscaping, to minimise the visual impact of vehicles on the street scene; and	The design considerations reflect National Grid's duty to be economical and efficient, as well as within the rigorous health and safety processes that National Grid has in place which govern how National Grid designs and constructs their projects safely. The Design Development Report (document reference 5.15), Design and Access Statement (document reference 7.15) and Design Approach for Site Specific infrastructure (document reference 7.16) summarises the different choices made during the design process.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• as appropriate to their scale, nature and location, should incorporate sustainable drainage principles to ensure that flood risk will not be increased either on or off site. All new development proposals should be safe and flood resilient for their lifetime. Where practicable, sustainable drainage systems should be designed to be multifunctional and deliver benefits for wildlife, amenity and landscape.	
	Policy WNP D4: Sites outside the settlement boundary	As defined on the Chelmsford Local Plan proposal map, proposals for development outside of (a) the defined settlement boundary of Writtle and (b) the allocated Warren Farm Growth Area, which satisfy Strategic Policy 11 in the Chelmsford Local Plan for infill development in the Green Belt and rural areas, and which also meet the following design principles, will be supported. Development proposals should: • demonstrate a sympathetic regard to the scale, height, roof line and distinctive architecture of neighbouring buildings, including the palette of materials; • provide an active frontage along the main streets or roads; and • where possible, maintain or make use of the footprints and envelopes of existing agricultural sheds and buildings.	The Design Development Report (document reference 5.15), Design and Access Statement (document reference 7.15), Design Approach for Site Specific infrastructure (document reference 7.16) and the Planning Statement (document reference 5.6) outlines how good design has been integral to the Project from the start. Detailed design is described in ES Chapter 4: Project Description (document reference 6.4), complemented by ES Chapter 3: Alternatives (document reference 6.3), which highlights environmental factors influencing design evolution. National Grid's design reflects its commitments to efficiency, safety, and health standards.
	Policy WNP LE1: Setting	Proposals for development which would not diminish the separation and openness between Writtle and Chelmsford, nor between the village of	The Project is routed to the west of Writtle and thus does not introduce the Project, with its urbanising features, into the gap between Writtle and Chelmsford. This

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		Writtle and Writtle University Campus, and which demonstrate that proposals will: • conserve and where possible enhance native hedgerows and mature woodland; • include screen planting of species native to Writtle around new development to minimise visual impact; and • incorporate materials that reflect local character as found in neighbouring buildings, will be supported.	ensures that the Project does not impact the openness between the two settlements. The project is also routed away from the gap between Writtle and the Writtle University Campus. The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. As set out in the Biodiversity Net Gain Report (document reference 7.1) National Grid is committed to deliver a minimum of 10% Biodiversity Net Gain. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once re-established.
	Policy WNP LE2: Natural Environment	Development proposals which are expected to retain and enhance the natural environment within the neighbourhood area including mature trees, hedgerows, ponds and other multi-functional green infrastructure and are expected to result in net environmental and biodiversity gains will be supported.	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) assesses the potential impacts of the Project's construction, operation, and maintenance phases on ecological and biodiversity receptors. Habitat connectivity will be preserved where possible by utilising existing access routes, minimising working widths through biodiversity receptors, and

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			maintaining connectivity via green corridors such as hedgerows and watercourses. As set out in the Biodiversity Net Gain Report (document reference 7.1) National Grid is committed to deliver a minimum of 10% Biodiversity Net Gain. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once re-established.
	Policy WNP MA2: Traffic Management	Proposals for development which include appropriate mitigation measures that contribute towards traffic safety will be supported.	ES Chapter 16: Traffic and Transport (document reference 6.16) explains the residual effects of the Project. Measures to manage construction traffic impacts are set out in the Outline CoCP (document reference 7.2) and Outline CTMP (document reference 7.3). These documents also explain the approach to travel planning for construction staff including promoting walking and cycling and public transport. Mitigation measures to reduce impacts on PRoW during construction are set out the Outline PRoW Management Plan (document reference 7.6).
	Policy WNP H1: Conservation	Conservation areas, listed buildings and monuments Development proposals in Writtle Parish are required to conserve and enhance:	The Project is routed outside of the Writtle Conservation Area, listed buildings and monuments. The setting of this conservation areas was not found to

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
	Area and Heritage Assets	• The special interest, character and appearance of the Conservation Area, including key assets such as Greenbury Green, St. Johns Green, Lawford Lane, St. Johns Road, Lodge Road and Roman Place; and • The significance of designated heritage assets and their settings including listed buildings and monuments in line with National and City Council Policy. Where it is proposed to retrofit historic buildings for the purposes of energy efficiency this will be encouraged where undertaken sensitively and safeguarding the special characteristics of the heritage asset. Non-designated heritage assets Development proposals should protect and where appropriate enhance non-designated heritage assets which make a significant contribution to the historic fabric of Writtle. Non-designated heritage assets identified by the Parish Council are listed in Appendix 4. Development proposals affecting non-designated heritage assets (or their settings) should be endorsed by appropriate analysis to enable a balanced judgment regarding the scale of any harm or loss and the significance of heritage asset to be made.	extend into the Order Limits as it is enclosed by development that has come forward after the features of historic value within it, which separate the conservation area from the Order Limits. As such the impact on this conservation area was scoped out of the Environmental Assessment. Several Listed Buildings are located in close proximity to the Project within the Neighbourhood Plan Boundary. Therefore, the impacts on these assets are considered in the Assessment of Harm to Designated Heritage Assets (document reference 6.11.7). This assessment finds that in the majority of cases there would be a 'Lower Less Than Substantial Harm'. The Grade II Listed Granary and Cart Lodge at Southwoods Farm and Barn at Southwoods Farm are identified as having Mid Less Than Substantial Harm, as these are sited in close proximity to pylon TB175. Where less than substantial harm is identified, this harm should be weighed against the benefits of the proposals. Harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which treat CNP

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets.
Section G			
Ingatestone and Fryerning (5 August 2022)	Policy 2: Design and New Developments	Developments should: • Contribute positively to the existing local historic character and appearance of the area, presenting modern design features which reflect locally distinctive architectural styles. • Include a high-quality design which will contribute positively to the character and appearance of the surrounding area • Reflect, integrate and respond positively to the scale, design, character, density and layout of existing development in the surrounding area and not result in significant harm to neighbouring residential amenity	Chapter 5 of the Planning Statement (document reference 5.6) outlines how good design has been integral to the Project from the start. Detailed design is described in ES Chapter 4: Project Description (document reference 6.4), complemented by ES Chapter 3: Alternatives (document reference 6.3), which highlights environmental factors influencing design evolution. National Grid's design reflects its commitments to efficiency, safety, and health standards. Key documents, including the Design Development Report (document reference 5.15), Design and Access Statement

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• Where appropriate, create a strong and positive sense of place and identity • Incorporate use of materials which enhances the quality of design, defines routes and spaces and preserves and enhances the character of the area • Consideration of the layout and orientation of buildings within sites when seeking to achieve energy efficiency, energy conservation and efficiency, flood resilience, and sustainable waste and water management. • Design appropriate SuDS proposals to manage surface water at its source and water quality using a variety of SuDS methods such as infiltration, interception, rainwater harvesting, and greywater recycling, which includes source control features such as permeable paving, water butts, rain gardens, green roofs, and site control features such as swales, ponds and detention basins. • Where possible, create interesting views in and out of development through public open spaces ▪ Provide an appropriate provision of off-street parking in accordance with the adopted Essex County Council Parking Standards • Seek to limit the visual impact of car parking through the use of garages, car ports, off rear parking areas and planting. Any solutions should be in accordance with BBC's parking standards – Parking Standards: Design and Good Practice 2009, which they adopted as a	(document reference 7.15) and Design Approach for Site Specific infrastructure (document reference 7.16) summarises the different choices made during the design process. ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) outlines the standard and additional mitigation measures relevant to hydrology, land drainage, and flood risk. These measures will be secured through the Outline CoCP (document reference 7.2). The Outline CoCP (document reference 7.2) will be secured via a Requirement in the Development Consent Order (DCO), which mandates that the Main Works Contractor(s) prepare the CoCP substantially in accordance with the Outline CoCP to satisfy the Requirement. In Writtle, the Project does interact with an area of flood risk along an ordinary watercourse that is a small tributary for the River Can. The Project oversails this and pylons TB165 and TB166 are sited outside of the area at risk of flooding either side of the watercourse. An existing overhead line is being undergrounded along a road that is within the area of flood risk. Within the Ingatestone and Fryerning Neighbourhood Plan area, the relevant viewpoints for the Project are VP2.12, VP2.13 and VP2.36. Visual receptors are grouped into Visual Receptor Areas (VRAs) based on location, landscape

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		Supplementary Planning Documents (SPD) on 10 March 2011. • Provide street tree planting as recommended within the Essex County Council Street Material Guide: Design and Good Practice 2014. • Preserve views of local landmarks, open space, green infrastructure and the wider rural landscape, which contribute to the rural character and appearance of the area. • Create an accessible and inclusive design for all age groups and abilities • Provide a safe and secure environment, including measures through design and layout which will seek to reduce and prevent crime and enhance personal safety • Incorporate sustainable design features which promote energy efficiency and conservation, renewable energy generation, innovative low carbon technology, water efficiency, flood resilience, biodiversity gains and sustainable waste and mineral management. Proposals should take account of the Essex Climate Action Commission (ECAC) report 'Net Zero: Making Essex Carbon Neutral' in the design of new developments. New proposals for older people's housing should demonstrate how the HAPPI principles have been incorporated into the design of the development. In new developments of 20 or more, a minimum of 5% of new homes should be built to Building Regulations Part M4(3) a standard which ensures	characteristics, and similar views, as shown in ES Figure 13.7: Visual Receptors and Viewpoints (document reference 6.13.F7). VRAs and representative viewpoints were identified through site surveys, desktop analysis, and Neighbourhood Plans. Visual effects of linear developments, like overhead lines, are assessed using representative viewpoints to capture typical views, following GLVIA3 guidelines for a proportionate and focused LVIA. Whilst important views have been considered, individual assessments from each identified location have not been presented in the LVIA.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		that at least some new homes will be suitable for occupation by wheelchair users. All non-residential development should achieve a minimum of BREEAM 'very good' rating or be supported by a bespoke assessment that demonstrates appropriate environment performance results above current Building Regulation requirements.	
	Policy 3: Heritage	Development within the three Conservation Areas within the Plan are, which are shown on the maps at Appendices 2-4 and should demonstrate how the proposals will protect the character, appearance, setting and historical interest of the Conservation Area. Development proposals should seek to protect and where appropriate enhance, heritage assets within the parish. Development proposals which affect a designated or non-designated heritage asset should outline the historical significance of the local importance of the asset to the character and appearance of Ingatestone and Fryerning and should clearly outline the impacts of the proposed development on the historical significance and local importance of the asset. • Relevant evidence base documents: • Ingatestone High Street Conservation Area Appraisal and Management Plan, ECC, 2008 • Fryerning Conservation Area Appraisal and Management Plan, ECC, 2011. • Station Lane, Ingatestone, Conservation Area Appraisal and Management Plan, ECC, 2008.	ES Chapter 11: Historic Environment (document reference 6.11) reports the assessment of the likely significant cultural heritage effects that could result from the Project. The Ingatestone High Street, Ingatestone Station Lane and Fryerning Conservation Areas are located within this Neighbourhood Plan Area. The settings of these conservation areas were not found to extend into the Order Limits and as such impacts on these were scoped out of the Environmental Assessment. Several Listed Buildings are located in close proximity to the Project within the Neighbourhood Plan Boundary. Therefore, the impacts on these assets are considered in the Assessment of Harm to Designated Heritage Assets (document reference 6.11.7). This assessment finds that in the majority of cases there would be a 'Lower Less Than Substantial Harm'. The Grade II Listed Ingatestone Over the River Wid (That Part in Brentwood District) [sic] is

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			identified as having Mid Less Than Substantial Harm, as this is sited within 5 metres of pylon TB190. Where less than substantial harm is identified, this harm should be weighed against the benefits of the proposals. Harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. The ES chapter concludes that the Project would not result in substantial harm to any heritage assets. Mitigation measures to reduce impacts on archaeology are set out

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
			in the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (document reference 7.5) and includes preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction.
	Policy 5: Transport	Proposals for new development should: • Provide car and cycle parking in accordance with the Essex County Council Parking Standards [16]. • Not result in a reduction in car parking spaces within Ingatestone • Not result in any detrimental impact on local highway safety and where possible improve highway safety, within the parish ▪ Where possible, protect and enhance public right of way, pedestrian and cycle routes and bridleways throughout the parish • Not significantly increase levels of congestion within the parish • Where appropriate, improve accessibility and increase the use of sustainable modes of transport within the parish by providing or contributing towards public transport improvements and infrastructure and providing safe pedestrian and cycle routes to surrounding areas, public transport and local services and facilities.	ES Chapter 16: Traffic and Transport (document reference 6.16) explains the residual effects of the Project. Parking and loading effects on road links within the Primary Access Routes (PAR) were analysed, considering the loss of various parking facilities for over four weeks in a 12-month period. Such losses may impact residents and businesses by increasing journey times. However, the significance of effects on all road links is classified as slight or neutral and not significant. No temporary changes to on street parking have been identified as being required in Ingatestone Neighbourhood Plan area.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		• Not detrimentally impact air quality and public health within the parish as a result of increased traffic flows and congestion • Create safe and accessible environments, particularly for those with limited mobility • Incorporate appropriate and sympathetic lighting to public areas which will enhance accessibility and safety • Provide infrastructure to support electric and low emission vehicles. • Proposals for new or improved bridleways, pedestrian and cycle routes connecting Ingatestone and Fryerning and Mill Green, will be supported • Proposals that provide or contribute towards new or improved car parking provision within Ingatestone will be supported b. Development proposals for 25 or more dwellings in the parish should assess and clearly demonstrate the impact of the scheme on the local highway capacity and public transport services Proposals which improve the safety of pedestrians and cyclists will be encouraged and supported.	
	Policy 6: Environment	Development proposals should protect and where possible enhance the natural environment. All development proposals should seek to deliver net biodiversity gain, in addition to protecting existing habitats and species. Any proposals which negatively affect, or have the potential to negative affect, the natural environment should demonstrate that any negative impacts on	ES Chapter 8: Ecology and Biodiversity (document reference 6.8) assesses the potential impacts of the Project's construction, operation, and maintenance phases on ecological and biodiversity receptors. Habitat connectivity will be preserved where possible by utilising existing access routes, minimising working

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		biodiversity, including flora, fauna and wildlife habitats, will be adequately mitigated. Development proposals which may have an impact on wildlife habitats in the parish should be accompanied by an ecological assessment which will clearly demonstrate any potential impacts. Development proposals will be encouraged that seek to enhance the provision of and access to green infrastructure and open space in the parish by: • Creating new areas of green infrastructure and open space. • Improve the connectivity between wildlife habitat areas and green infrastructure and open space through wildlife corridors and/or improvements to the Public Right of Way and cycle, bridleway and footpath networks. • Enhancing the visual characteristics and biodiversity of green infrastructure and open space in close proximity to new development. Development proposals which would result in the net loss of green infrastructure or areas of open space will only be supported where it can be demonstrated that: • The benefits of the project outweigh any identified harm created by the loss • Overall the development results in a net biodiversity gain for the area and improvements to habitats in relation to quantity, quality and connectivity • Any compensatory wildlife habitat is created as close as possible to the development site and	widths through biodiversity receptors, and maintaining connectivity via green corridors such as hedgerows and watercourses. The Biodiversity Net Gain (BNG) Report (document reference 7.1) has been prepared to support the Project following National Grid's commitment to deliver at least a 10% Environmental Net Gain.

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		should be ecologically functional in advance of any loss. New development proposals should seek opportunities to reduce carbon emissions by: • Encouraging the use of sustainable modes of transport within the design of developments through safe walking and cycling routes which provide connections to surrounding public transport and local services and facilities. • Encouraging home working by designing homes to be adaptable and ensuring good quality mobile phone and broadband connections • Seeing new tree planting within new development schemes in the parish, including proposals for long-term maintenance of newly planted trees. • Providing electric car charging points within new developments, or as a minimum ensuring essential infrastructure is in place to enable charging points to be provided in the future. • Incorporating sustainable design features which promote net zero carbon standards, energy efficiency, biodiversity gains, innovative low carbon technology, water efficiency, energy conservation and efficiency, renewable energy generation, flood resilience, sustainable waste and mineral management. Management, such as infiltration, interception, rainwater harvesting, and grey water recycling, which include source and water quality control features such as permeable paving, water	

Neighbourhood Plan	Policy	Policy Requirement	How the Project has had regard to Neighbourhood Plan Policies
		butts, rain gardens, green roofs, and site control features such as swales, ponds, and detention basins. Development proposals should incorporate Sustainable Drainage Systems (SuDS) where appropriate to manage greenfield surface water runoff rates and to reduce the potential for flooding. Sustainable Drainage Systems should be designed to deliver multi-purpose space to enhance biodiversity net gain and ecosystems within new developments. SuDS proposals should be designed appropriately to manage surface water and water quality. The frequent flooding of the River Wid should be addressed by Brentwood Borough Council and Chelmsford City Council jointly as an s106/CIL device.	
West Horndon Neighbourhood Plan	Brentwood Borough Council approved the designation of the West Horndon Parish as a Neighbourhood Plan Area at Planning & Development Committee on 19 November 2014. Consultation on the proposed area took place for six weeks between 29 May and 10 July 2014. A total of 23 responses were received showing broad support for the entire parish to be designated.		

Abbreviations

Abbreviation	Full Reference
AIL	Abnormal Indivisible Load
AIS	Air Insulated Switchgear
AONB	Area of Outstanding Natural Beauty
BNG	Biodiversity Net Gain
BPA	British Pipeline Agency
CBS	Cement-Bound Sand
CoCP	Code of Construction Practice
CSE	Cable Sealing End
CTMP	Construction Traffic Management Plan
CWS	Country Wildlife Site
DCO	Development Consent Order
DESNZ	Department for Energy Security and Net Zero
EACN	East Anglia Connection Node
EIA	Environmental Impact Assessment
EMF	Electric and Magnetic Field
ES	Environmental Statement
FTE	Full Time Equivalent
GIS	Gas Insulated Switchgear
HDD	Horizontal Directional Drilling
HGV	Heavy Goods Vehicles
HVAC	High Voltage Alternating Current
ICNIRP	International Commission on Non-Ionizing Radiation Protection
IDB	Internal Drainage Board
Km	Kilometre
kV	Kilovolt
LED	Light-emitting diode
LEMP	Landscape and Ecological Management Plan
LLFA	Lead Local Flood Authority

Abbreviation	Full Reference
LoD	Limits of Deviation
LTC	Lower Thames Crossing
LVAC	Low Voltage Alternating Current
LWS	Local Wildlife Site
MRN	Major Road Network
NETS SQSS	National Electricity Transmission System Security and Quality of Supply Standard
NMU	Non-Motorised User
NPS	National Policy Statement
NRMM	Non-Road Mobile Machinery
PAR	Primary Access Route
The Project	Norwich to Tilbury
PRoW	Public Right of Way
SRN	Strategic Road Network
SSSI	Site of Special Scientific Interest
SWMP	Site Waste Management Plan
UK	United Kingdom
UKPN	UK Power Networks

Glossary

Term	Description
Abnormal Indivisible Loads	A large load which cannot 'without undue expense or risk of damage' be divided into two or more smaller loads for the purposes of being transported by road, and which exceeds limits set out in terms of weight (>44 tonnes), length (>18.65 m), and width (>2.9 m).
Additional mitigation measures	Comprises measures over and above embedded and standard mitigation measures to reduce environmental effects. This would include, but not be limited to, mitigation required for protected species.
Alignment	The proposed overhead line and underground cable route.
Ancient woodland	Land that has been continually wooded since at least 1600 in England. Regarded as 'irreplaceable habitat' in national planning policy and guidance. Ancient woodland greater than 2 ha is recorded on the Natural England Ancient Woodland Inventory.
Angle/tension pylon	Pylon where a horizontal insulator string attaches the conductors. Tension or 'angle' pylons are used at points where the overhead line alignment changes direction.
Archaeological remains	The material remains of human activity from the earliest periods of human evolution to the present. These may be buried traces of human activities, sites visible above ground, or moveable artefacts.
Archaeological Mitigation Strategy and Outline Written Scheme of Investigation	Sets out the scope, guiding principles and methods for the planning and implementation of additional archaeological mitigation works associated with the construction of the Project.
Authorised development	The development and associated development described in Part 1 of Schedule 1 (authorised development) of the draft Development Consent Order and any other development authorised by the Order, which is development within the meaning of s32 of the Planning Act 2008.
Bellmouth	A flared vehicular access point connecting a construction site to the public highway, designed to accommodate turning movements by large vehicles.
Best practicable means	A term used under the Control of Pollution Act 1974 and Environmental Protection Act 1990 to refer to measures which are reasonably practicable, having regard to local conditions and circumstances, to the current state of technical knowledge and to financial implications, concerning the mitigation of noise and other potential nuisance.
Biodiversity	The variability among living organisms from all sources including terrestrial, marine and other aquatic ecosystems and the ecological

Term	Description
	complexes of which they are part: this includes diversity within species, between species and of ecosystems.
Biodiversity Net Gain	An approach for developments to ensure habitats for wildlife are left in a measurably better state than they were before the development.
Biosecurity	Measures aimed at preventing the spread of harmful organisms (e.g. viruses and bacteria) to crops and livestock in order to reduce the risk of transmission of infectious diseases.
Busbar	The common connection point of two or more transmission circuits.
Circuit	A set of wires along which current flows and returns. It is necessary to have a complete circuit for current to flow. The National Grid standard for overhead lines operating at 400 kV is for pylons to carry two circuits, each consisting of three phases, i.e. a double circuit configuration.
Cable	An insulated conductor designed for underground installation.
Cable Sealing End	Structures used to transfer transmission circuits between underground cables and overhead lines.
Cable Sealing End compound	Electrical infrastructure used as the transition point between overhead lines and underground cables. A compound on the ground acts as the principal transition point.
Cable Sealing End platform	Electrical infrastructure used as the transition point between overhead lines and underground cables. A platform on the pylon acts as the principal transition point.
Catenary Wire	A catenary wire is a tensioned wire rope suspended between two anchor points
Code of Construction Practice	A code of construction practice sets out the standards and procedures to which a developer (and its contractors) must adhere in order to manage the potential effects of construction works.
Commitments	Measures that a developer commits to delivering as part of a project, with the purpose of limiting, mitigating or compensating potential effects of the project.
Conductor	The overhead wire that carries electricity from one place to another, for example the line between two pylons.
Conservation Area	An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance as defined in s69(1)(a) in the Planning (Listed Building and Conservation Areas) Act 1990.
Construction Traffic Management Plan	Plan detailing the procedures, requirements and standards necessary for managing the traffic effects during construction of the Project so that safe, adequate and convenient facilities for local movements by all transport modes are maintained throughout the construction process.

Term	Description
Contaminated Land	Land where a substance or contaminant is in or under the land which has the potential to cause significant harm or the significant possibility of significant harm to human health, property or protected species, or significant pollution or the significant possibility of significant pollution to controlled waters.
Corona discharge	An electrical discharge caused by the ionisation of fluid such as air surrounding a conductor carrying a high voltage. It represents a local region where the air (or other fluid) has undergone electrical breakdown and become conductive. A corona occurs at locations where the strength of the electric field (potential gradient) around a conductor exceeds the dielectric strength of the air.
County Wildlife Site	Non-designated areas of land important for their wildlife and nature conservation value.
Culvert	A channel or pipe that carries water below the level of the ground.
Design Appraisal for Site-Specific Infrastructure	Document developed by National Grid to outline the design principles that can be taken forward into the detailed design, set out an approach to the design of site-specific infrastructure of non-linear works, and to detail those elements of the design which have some flexibility in their appearance.
Dewatering	The removal of groundwater (e.g. by pumping) to keep a below-ground works area dry.
Development Consent Order	A statutory instrument which grants consents and other rights to build a Nationally Significant Infrastructure Project, as defined by the Planning Act 2008.
Distribution Network Operator	Companies that own and operate the power lines and infrastructure that connect the National Grid network to individual properties.
Easement	A legal right in perpetuity granting National Grid the right to install, use, maintain, replace, renew and remove its equipment.
Electric and Magnetic Fields	All equipment that generates, distributes or uses electricity produces Electric and Magnetic Fields (EMF), and EMFs also occur naturally. Electric fields are created by differences in voltage: the higher the voltage, the stronger the resultant field. Magnetic fields are created when electric current flows: the greater the current, the stronger the magnetic field.
Embedded design measures	Mitigation measures are those that are intrinsic to and built into the design of the Project.
Environmental Impact Assessment (EIA)	An assessment of the likely effects of a development project on the environment, which is reported in an Environmental Statement that is publicised and consulted on and taken into account in the decision on whether a project should proceed.
Environmental Areas	These are locations identified for environmental embedded measures, mitigation and/or Biodiversity Net Gain/environmental enhancement.

Term	Description
Environmental Statement (ES)	The main output from the EIA process, an ES is the report required to accompany an application for development consent (under the Infrastructure Planning (EIA) Regulations 2017) to inform public and stakeholder consultation and the decision on whether a project should be allowed to proceed. The EIA Regulations set out specific requirements for the contents of an ES for Nationally Significant Infrastructure Projects.
Environmental topic	A subject area covered within the EIA, for example landscape and visual or biodiversity.
Flood Risk Assessment	A Flood Risk Assessment is an assessment of the risk of flooding, particularly in relation to residential, commercial and industrial land use. In England and Wales, the Environment Agency requires a Flood Risk Assessment to be submitted alongside planning applications in areas that are known to be at risk of flooding.
Full-time equivalent	Unit of measurement used to calculate the total full time hours worked by staff.
Full line tension gantries	Types of gantries which allow conductors to connect into a substation or compound directly from a pylon, without requiring a bulky terminal pylon. This allows a larger span between the final pylon and the gantry.
Gantry	An overhead bridge-like structure supporting electrical equipment. A transition point from overhead line equipment to equipment in a compound.
Greenhouse gases	The term ‘greenhouse gases’ refers to a number of chemicals in the earth’s atmosphere such as carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O).
Groundwater	Water that is in the ground. This is usually referring to water in the saturated zone below the water table.
Habitats Regulations Assessment	The process by which plans and projects are assessed as to whether they are likely to have a significant effect on a European site either alone or in combination with other plans or projects, under the Conservation of Habitats and Species Regulations 2017 (as amended).
Haul road	A route used by construction traffic within the Order Limits to access a working area from a site access point.
Heavy Goods Vehicles	Goods vehicles weighing more than 3,500 kg.
High voltage	275,000 volts and over. National Grid’s transmission lines generally operate at 275,000 and 400,000 volts. Lower voltage lines, such as 132,000 volts and 33,000 volts, are generally owned by local distribution companies.
High voltage alternating current	The transmission and distribution of electrical energy using alternating current (AC) at high voltage levels.

Term	Description
Horizontal directional drilling	Trenchless method for the installation of pipes, in a shallow arc using a surface-launched drilling rig. In particular, it applies to large-scale crossings in which a fluid filled pilot bore is drilled without rotating the drill string, and this is then enlarged by a washover pipe and back reamer to the size required for the product pipe.
Insulator	Used to attach the conductors to the pylons, preventing electrical discharge to the steelwork.
Kilovolt	1,000 volts
Landscape character	A distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse.
Lattice pylon	Pylon type widely used on the national electricity transmission networks. Both standard lattice pylons (approximately 50 m in height) and low hight lattice pylons (approximately 40 m in height) are proposed on the Project.
Light Goods Vehicles	Goods vehicle weighing 3,500 kg or less.
Limits of Deviation (LoD)	LoD allow for adjustment to the final positioning of the permanent features, for example to avoid localised constraints or unknown or unforeseeable issues that may arise. This could include previously unidentified poor ground conditions which require a pylon to be moved slightly for geotechnical reasons, such as ground stability. The horizontal LoD define the parameters within which the position on the ground of proposed permanent features may deviate from the position shown on the plans. This applies to both linear (for example overhead lines and underground cables) and non-linear (for example the new EACN Substation and CSE compounds) proposed infrastructure. Vertical LoD limit the maximum vertical height, or the depth below ground, of any new infrastructure.
Listed building	A measure of a building's special architectural and historic interest. There are three categories of listed buildings, Grades I, II* and II, depending on the level of interest.
Local Nature Reserve	Sites dedicated by the Local Planning Authority under Section 21 of the National Parks and Access to the Countryside Act 1949 for nature conservation which have wildlife or geological features that are of special interest locally.
Major Accidents	A major accident is an event that threatens immediate or delayed serious environmental effects to human health, welfare and/or the environment and requires the use of resources beyond those of the client or its appointed representatives (i.e., contractors) to manage. Major accidents can be caused by disasters resulting from both man-made and natural hazards.
Local Planning Authority	The public authority whose duty it is to carry out specific planning functions for a particular area.

Term	Description
Lux	Measurement of the amount of light produced.
Main Works Contractor(s)	Contractor(s) appointed by National Grid to construct the Project
Mitigation	The action of reducing the severity and magnitude of change (impact) to the environment. Measures to avoid, reduce, remedy or compensate for significant adverse effects.
National Electricity Transmission System Security and Quality of Supply Standard	The NETS SQSS sets out a coordinated set of criteria and methodologies that the Transmission Licensees shall use in the planning and operation of the National Electricity Transmission System.
National Landscape (an Area of Outstanding Natural Beauty)	Formally designated under the National Parks and Access to the Countryside Act of 1949 to protect areas of the countryside of high scenic quality that cannot be selected for National Park status due to their lack of opportunities for outdoor recreation (an essential objective of National Parks). As of November 2023, all AONBs became 'National Landscapes'. This reflects ambitions for the areas to play a key part in the international '30 by 30' commitment (to protect and conserve a minimum of 30% of land and sea for biodiversity by 2030).
Nationally Significant Infrastructure Project	Typically a large scale development of national importance that requires development consent from the Secretary of State, under the Planning Act 2008.
Order Limits	The maximum extent of land within which the authorised development may take place.
Overhead line	Conductor (wire) carrying electric current, strung from pylon to pylon.
Overhead Line Craftperson	Person who constructs the overhead line infrastructure
Overhead line refurbishment	Repair and renewal of conductors, pylon painting, earthwire, fittings and insulators and, where necessary, remedial works to the pylon and foundations.
Permanent access	Access required to infrastructure during the operational phase of the Project, for operational and maintenance purposes.
Piling	Engineering process of installing elongated structural elements, known as piles, into the subsoil. This technique is employed to transfer structural loads to deeper, more competent strata, thereby providing stable foundations for construction projects. Essentially, it addresses situations where surface soils lack sufficient bearing capacity to support intended structures.
Primary Access Routes (PAR)	These are the roads on the local road network that would be used by construction vehicles between the strategic road network and the access points within the Order Limits.

Term	Description
Project Section	Geographical ‘sections’ have been identified that break the Project down into smaller units for ease of description within the documentation. These Project Sections are broken down into eight sections based largely on Local Planning Authority boundaries.
Public Right of Way (PRoW)	A footpath, bridleway or byway accessible to all members of the public.
Pulling site	A site where the winching equipment that is used to pull through the new conductors is located.
Pylon	Structures that support the overhead line (conductors).
Scoping	Scoping is the process of determining the content and extent of matters that should be covered in the Environmental Impact Assessment.
Scoping Report	Report determining the content and extent of matters that should be covered in the Environmental Impact Assessment.
Site access points	A location connecting a construction site to the public highway.
Standard mitigation measures	Comprise management activities and techniques, which would be implemented throughout construction of the Project to limit effects through adherence to good site practices.
Statutory Undertakers	Persons with regulatory powers and duties, such as gas, electricity, water and transport providers or transmitters.
Subsoil	Weathered soil layer extending between the natural topsoil and the unweathered basal layer (geological parent material, either solid or drift) below.
Substation	Substations are used to control the flow of power through the electricity system. They are also used to change (or transform) the voltage from a higher to lower voltage to allow it to be transmitted to local homes and businesses.
Suspension pylon	Pylon where conductors are suspended by a vertical insulator string. Suspension pylons support the conductors on straight stretches of overhead line.
Temporary overhead line diversions and pylons	Temporary diversions of existing overhead line may be required to ensure electricity flows are maintained at all times during construction of the Project to limit the disruption to the electricity network. These typically comprise a short section of overhead line with temporary structures or pylons which electricity flows are diverted along.
Tensioning site	A site where the new conductor is fed out from during construction. This also includes a tensioning winch to keep the conductor off the ground.
Terminal pylon	Pylons erected at the end of the overhead line to terminate the line at substations or where overhead lines are connected to underground

Term	Description
	cables. Because of the uneven load on one side of the pylons, much deeper and heavier foundations are required on the unloaded side.
Transmission line	A National Grid overhead line and underground cable which transmits electricity between National Grid's substations. Power is transmitted at high voltages (275 kV or above) between power stations where it is generated and the local electricity supply networks of the regional Distribution Network Operators where it is transformed to lower voltages (132 kV or below) for supply via distribution lines to local communities.
Transport Assessment	Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport effects of the Project. It is separate to Chapter 16: Traffic and Transport (document reference 6.16).
Trenchless crossing	A crossing installation method that has limited above-ground disturbance which is used to avoid a sensitive feature such as an environmental feature.
Triple Araucaria conductors	Triple Araucaria conductor design is the least electrically stressed conductor system that National Grid uses. It is the best design for reducing the effects of line crackle (corona discharge).
Topsoil	Material which developed originally at the top of the soil profile and is characteristically darker in colour and has a higher organic matter content than subsoil material.
Temporary construction compounds	Temporary compounds installed during the construction phase of the Project. Each compound may contain storage areas including laydown areas, soils storage and areas for equipment and fuel, drainage, generators, car parking and offices and welfare areas (portacabins).
UK Power Networks	UK Power Networks (Operations) Limited (registered company number 03870728) and/or its affiliate Eastern Power Networks plc (registered company number 02366906) as applicable.
Underground cable	An insulated conductor carrying electric current designed for underground installation. Underground cables link together two Cable Sealing End compounds.
Value engineering	Value engineering in transmission projects involves a systematic approach to optimising the project's value by finding the most cost-effective way to achieve its essential functions without compromising quality or performance. It is a team effort that examines all aspects of the project, from planning to construction, to identify areas where costs can be reduced or improved without sacrificing the project's objectives.
Visibility splay	Areas of tree/vegetation removal, typically where access points are, to enable a driver to see down the road and know when the road is clear.
Voltage	The electrical potential difference between two points.

Term	Description
Water Framework Directive	The Water Framework Directive (2000/60/EC) commits European Union member states to achieve good qualitative and quantitative status of all water bodies. It is transposed into law in England and Wales via The Water Environment (Water Framework Directive) (England and Wales) 2017 Regulations, which were retained via the European Union (Withdrawal) Act 2018.
Working area	Working area required to construct elements of the Project, such as pylons, underground cables, CSE compounds.

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