

AENC-NG-CNS-REP-0101

Norwich to Tilbury

Volume 5: Reports and Statements

Document: 5.9.1 Draft Statement of Common Ground - Norfolk
County Council (NCC) (incl LLFA and Highways) - Tracked Changes
Version

Final Issue B

February 2026

Planning Inspectorate Reference: EN020027

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

nationalgrid

Revision History

<u>Version</u>	<u>Date</u>	<u>Submitted at</u>
<u>A</u>	<u>29 August 2025</u>	<u>DCO Application</u>
<u>B</u>	<u>26 February 2026</u>	<u>Deadline 1</u>

Contents

1	Introduction	1
1.1	Overview	1
1.2	Project Description	1
1.3	Format and Structure of this Document	3
2.	Record of Key Engagement	4
2.2	Summary of Key Engagement	4
3.	Matters Agreed, Not Agreed or Under Discussion	18
3.1	Overview	18
3.2	Project development, description and design	19
3.3	Ecology and Biodiversity	26
3.4	Contaminated Land, Geology and Hydrogeology	30
3.5	Health and Wellbeing (including Air Quality and Noise and Vibration)	35
3.6	Historic Environment	38
3.7	Hydrology, Land Drainage and Flood Risk	44
3.8	Landscape and Visual	48
3.9	Socio-economics, Recreation and Tourism	52
3.10	Traffic and Transport	57
3.11	Public Rights of Way (PRoW)	77
3.12	Cumulative Effects	80
3.13	Development Consent Order	83
3.14	Other Matters	116
4.	Confirmation of Agreement	117
Table 2.1	Summary of engagement between National Grid and NCC	4
Table 3.1	Agreement status for matters presented in Section 3	18
Table 3.2	Matters Agreed, Not Agreed or Under Discussion in relation to project development, description and design matters	19
Table 3.3	Matters Agreed, Not Agreed or Under Discussion in relation to Ecology and Biodiversity	26
Table 3.4	Matters Agreed, Not Agreed or Under Discussion in relation to Contaminated Land, Geology and Hydrogeology	31
Table 3.5	Matters Agreed, Not Agreed or Under Discussion in relation to Health and Wellbeing	35
Table 3.6	Matters Agreed, Not Agreed or Under Discussion in relation to Historic Environment	39
Table 3.7	Matters Agreed, Not Agreed or Under Discussion in relation to Hydrology, Land Drainage and Flood Risk	44
Table 3.8	Matters Agreed, Not Agreed or Under Discussion in relation to Landscape and Visual	48
Table 3.9	Matters Agreed, Not Agreed or Under Discussion in relation to Socio-economics, Recreation and Tourism	52
Table 3.10	Matters Agreed, Not Agreed or Under Discussion in relation to Traffic and Transport	57
Table 3.11	Matters Agreed, Not Agreed or Under Discussion in relation to Public Rights of Way	77

Table 3.12	Matters Agreed, Not Agreed or Under Discussion in relation to Cumulative Effects	80
Table 3.13	Matters Agreed, Not Agreed or Under Discussion in relation to Development Consent Order	83

Abbreviations	118
---------------	-----

1	Introduction	1
1.1	Overview	1
1.2	Project Description	1
1.3	Format and Structure of this Document	3
2	Record of Key Engagement	4
2.2	Summary of Key Engagement	4
3	Matters Agreed, Not Agreed or Under Discussion	16
3.1	Overview	16
3.2	Project development, description and design	17
3.3	Ecology and Biodiversity	23
3.4	Contaminated Land, Geology and Hydrogeology	27
3.5	Health and Wellbeing (including Air Quality and Noise and Vibration)	30
3.6	Historic Environment	34
3.7	Hydrology, Land Drainage and Flood Risk	38
3.8	Landscape and Visual	41
3.9	Socio-economics, Recreation and Tourism	44
3.10	Traffic and Transport	48
3.11	Public Rights of Way (PRoW)	62
3.12	Cumulative Effects	64
3.13	Development Consent Order	67
3.14	Other Matters	67
4	Confirmation of Agreement	68

Table 2.1	Summary of engagement between National Grid and NCC	4
Table 3.1	Agreement status for matters presented in Section 3	16
Table 3.2	Matters Agreed, Not Agreed or Under Discussion in relation to project development, description and design matters	17
Table 3.3	Matters Agreed, Not Agreed or Under Discussion in relation to Ecology and Biodiversity	23
Table 3.4	Matters Agreed, Not Agreed or Under Discussion in relation to Contaminated Land, Geology and Hydrogeology	27
Table 3.5	Matters Agreed, Not Agreed or Under Discussion in relation to Health and Wellbeing	30
Table 3.6	Matters Agreed, Not Agreed or Under Discussion in relation to Historic Environment	34
Table 3.7	Matters Agreed, Not Agreed or Under Discussion in relation to Hydrology, Land Drainage and Flood Risk	38
Table 3.8	Matters Agreed, Not Agreed or Under Discussion in relation to Landscape and Visual	41

Table 3.9	Matters Agreed, Not Agreed or Under Discussion in relation to Socio-economics, Recreation and Tourism	44
Table 3.10	Matters Agreed, Not Agreed or Under Discussion in relation to Traffic and Transport	48
Table 3.11	Matters Agreed, Not Agreed or Under Discussion in relation to Public Rights of Way	62
Table 3.12	Matters Agreed, Not Agreed or Under Discussion in relation to Cumulative Effects	64
Table 3.13	Matters Agreed, Not Agreed or Under Discussion in relation to Development Consent Order	67
<hr/>		
	Abbreviations	69
<hr/>		

1 Introduction

1.1 Overview

1.1.1 This draft Statement of Common Ground (SoCG) has been prepared by National Grid Electricity Transmission plc (referred to as National Grid within this document) and Norfolk County Council (NCC). It identifies areas of the Norwich to Tilbury Development Consent Order (DCO) application (the Application) where matters are agreed, under discussion or not agreed between the parties.

1.1.2 This SoCG has been structured to reflect topics of the Application which are relevant to NCC. The applicable matters considered within this SoCG apply to NCC's statutory remit. The following bullet points present the topics included in this SoCG (they are also presented in Section 3):

- Project development, description and design
- Ecology and Biodiversity
- Contaminated Land, Geology and Hydrogeology
- Health and Wellbeing (including Air Quality and Noise and Vibration)
- Historic Environment
- Hydrology, Land Drainage and Flood Risk
- Landscape and Visual
- Socio-economics, Recreation and Tourism
- Traffic and Transport
- Public Rights of Way (PRoW)
- Cumulative Effects
- Development Consent Order
- Other Matters

Note: This draft SoCG has been prepared at an early ~~stage~~ phase of the DCO examination process, for ~~Deadline 1~~ ahead of submission. It is intended to be a live and working document which will be updated as the Project progresses and shared with NCC at key points for discussion. A final SoCG will be prepared ahead of the close of the DCO Examination. Unlike a final SoCG, this draft SoCG has not been officially signed by either party.

1.2 Project Description

1.2.1 The Project is a proposal by National Grid to upgrade the electricity transmission system in East Anglia between Norwich and Tilbury, comprising:

- A new 400 kilovolt (kV) electricity transmission connection of approximately 180 km overall length from Norwich Main Substation to Tilbury Substation via

Bramford Substation, a new East Anglia Connection Node (EACN) Substation and a new Tilbury North Substation, including:

- Approximately 159 km of new overhead line supported on approximately 509 pylons, either standard steel lattice pylons (approximately 50 m in height) or low height steel lattice pylons (approximately 40 m in height) and some of which would be gantries (typically up to 15 m in height) within proposed Cable Sealing End (CSE) compounds or existing or proposed substations
- Approximately 21 km of 400 kV underground cabling, some of which would be located through the Dedham Vale National Landscape (an Area of Outstanding Natural Beauty (AONB1))
- Up to seven new CSE compounds (with permanent access) to connect the overhead lines to the underground cables
- Modification works to connect into the existing Norwich Main Substation and a substation extension at the existing Bramford Substation
- A new 400 kV substation on the Tendring Peninsula, referred to as the EACN Substation (with a new permanent access). This is proposed to be an Air Insulated Switchgear (AIS) substation
- A new 400 kV substation to the south of Orsett Golf Course in Essex, referred to as the Tilbury North Substation (with a new permanent access). This is proposed to be a Gas Insulated Switchgear (GIS) substation
- Modifications to the existing National Grid Electricity Transmission overhead lines to facilitate the connection of the existing network into the new Tilbury North Substation to provide connection to the Tilbury Substation
- Ancillary and/or temporary works associated with the construction of the Project.

1.2.2 In addition, third party utilities diversions and/or modifications would be required to facilitate the construction of the Project. There would also be land required for environmental mitigation and Biodiversity Net Gain (BNG).

1.2.3 As well as the permanent infrastructure, land would also be required temporarily for construction activities including, for example, working areas for construction equipment and machinery, site offices, welfare, storage and temporary construction access.

1.2.4 The Project would be designed, constructed and operated in accordance with applicable health and safety legislation. The Project will need to comply with design safety standards including the Security and Quality of Supply Standard (SQSS), which sets out the criteria and methodology for planning and operating the National Electricity Transmission System (NETS). This informs a suite of National Grid policies and processes, which contain details on design standards required to be met when designing, constructing and operating assets such as those proposed for the Project.

1.3 Format and Structure of this Document

1.3.1 This SoCG is structured as follows:

- **Section 2** provides a summary of the key engagement undertaken to date with NCC
- **Section 3** summarises the key matters and captures the status of each issue / matter
- **Section 4** includes the sign off sheet

2. Record of Key Engagement

2.1.1 National Grid has engaged with NCC on the Project throughout the pre-application process. This has included:

- Non-statutory consultation in Spring 2022 and Summer 2023
- Statutory consultation in Spring 2024
- Targeted Consultations in Spring 2025
- Regular meetings with lead officers about the Project as a whole
- Regular 'Thematic Group' meetings bringing together host authorities to discuss specific topics
- One to one / small group technical meetings on specific detailed matters
- Sharing of papers and documentation at key stages

2.1.2 Further details on National Grid's engagement with stakeholders is provided in the Consultation Report and the Environmental Statement.

2.2 Summary of Key Engagement

2.2.1 Table 2.1 provides an overview of the key engagement that has taken place between National Grid and NCC.

Table 2.1 Summary of engagement between National Grid and NCC

Date	Format	Topic/Description
General		
April 2022 – Ongoing	Meeting	Monthly informal catch-up calls.
September 2022	Meeting	All host authority workshop.
November 2022	Meeting	Briefings on issued response to questions from OffSET with all host authorities.
November 2022	Meeting	All host authority workshop.
January 2023	Meeting	All host authority workshop.
February 2023	Meeting	Pre-consultation session with all host authorities.
March 2023	Meeting	All host authority workshop.

Date	Format	Topic/Description
May 2023	Meeting	All host authority workshop.
June 2023	Meeting	Non-statutory consultation preferred alignment briefing to all host authorities.
July 2023	Meeting	All host authority workshop.
September 2023	Meeting	All host authority workshop.
November 2023	Meeting	All host authority workshop.
December 2023	Meeting	Discussions regarding the Waveney Valley and the Waveney Valley Alternative.
December 2023	Email Correspondence	National Grid issued the draft Statement of Community Consultation (SoCC) to all host authorities for comment.
January 2024	Meeting	All host authority workshop.
February 2024	Meeting	Statutory consultation preferred alignment briefing to all host authorities.
March 2024	Meeting	All host authority workshop.
March 2024	Email Correspondence	National Grid issued the SoCC to all host authorities for statutory consultation.
May 2024	Meeting	All host authority workshop.
September 2024	Email Correspondence	National Grid issued the draft Outline Code of Construction Practice (CoCP) to all host authorities for comment.
October 2024	Meeting	National Grid held a meeting to discuss comments from stakeholders on draft versions of the Outline Landscape and Ecological Management Plan (LEMP) and Outline CoCP.
November 2024	Meeting	Meeting to discuss National Grid's approach to targeted consultations
January 2025	Meeting	All host authority workshop
January 2025	Email Correspondence	National Grid issued the second iteration of the draft Outline Code of Construction Practice (CoCP)
January 2025	Meeting	National Grid held a meeting to discuss comments from the second iteration of the oCoCP and oLEMP
January 2025	Email Correspondence	National Grid issued the draft Statement of Common Ground (SoCG)
April 2025	Meeting	Meeting to go through host authority workshop updates (NCC unable to attend original workshop)

Date	Format	Topic/Description
May 2025	Meeting	All host authority workshop
May 2025	Email Correspondence	National Grid issued an updated iteration of the draft Outline Code of Construction Practice oCoCP
May 2025	Email Correspondence	National Grid issued a new appendix to the draft Outline Code of Construction Practice (oCoCP) - Appendix H, Draft Greenhouse Gas Reduction Strategy
May 2025	Email Correspondence	National Grid issued the Long List of Other Developments
June 2025	Email Correspondence	National Grid issued draft DCO, explanatory memorandum and draft requirements
July 2025	Meeting	All host authority workshop
August 2025	Email Correspondence	National Grid issued draft Heads of Terms for Biodiversity Net Gain (BNG) and off-site tree provision
August 2025	Meeting	Meeting to provide project and design update
September 2025	Meeting	All host authority workshop
November 2025	Meeting	All host authority workshop
January 2026	Meeting	Meeting to progress Statement of Common Ground
January 2026	Meeting	All host authority workshop

Ecology and Biodiversity

July 2022	Email Correspondence	National Grid shared the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology for review ahead of the Thematic Group meeting.
July 2022	Meeting	Ecology and Biodiversity Thematic Group meeting - National Grid presented on the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology and sought feedback from NCC and other authorities.
August 2023	Meeting	National Grid discussed the potential off-site scheme/initiatives for BNG.
March 2024	Meeting	Biodiversity Thematic Group to discuss the methodology and scope of ecology surveys outside the remit of Natural England.
May 2024	Technical Note	National Grid issued a technical note to all host authorities outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.
May 2024	Meeting	Optional Thematic Group call.

Date	Format	Topic/Description
September 2024	Email Correspondence	National Grid shared the Outline Landscape and Ecological Management Plan (oLEMP)
October 2024	Meeting	National Grid hosted a meeting to discuss comments from stakeholders on draft versions of the Outline LEMP and CoCP.
January 2025	Meeting	National Grid held a meeting to discuss comments from stakeholders on proposed mitigation for species outside the remit of Natural England
January 2025	Meeting	National Grid held a meeting to discuss comments received on the draft Biodiversity Net Gain Report
January 2025	Email Correspondence	National Grid shared the second iteration of the Outline Landscape and Ecological Management Plan (oLEMP)
January 2025	Email Correspondence	National Grid issued a technical note to all host authorities outlining the protected species proposed mitigation measures for agreement/comment
January 2025	Email Correspondence	National Grid issued the Biodiversity Net Gain Assessment Strategy
March 2025	Email Correspondence	National Grid issued the draft Arboriculture Impact Assessment (AIA)
April 2025	Meeting	Meeting to discuss comments from stakeholders on second iteration of proposed mitigation for species outside the remit of Natural England.
May 2025	Meeting	Meeting to discuss the updated Proposed Protected Species Mitigation document
May 2025	Email Correspondence	National Grid issued an updated iteration of the draft Outline Landscape and Ecological Management Plan (oLEMP)
May 2025	Email Correspondence	National Grid shared a new appendix to the Outline Landscape and Ecological Management Plan (oLEMP) – Appendix D, Outline Landscape Proposals
September 2025	Meeting	Optional thematic group meeting to discuss feedback on the ecology section of the Environmental Statement
February 2026	Meeting	National Grid hosted a meeting to discuss the Statement of Common Ground.
Contaminated Land, Geology and Hydrogeology		
August 2022	Email Correspondence	National Grid issued a draft Geology and Hydrogeology Assessment Methodology to all host authorities.

Date	Format	Topic/Description
September 2023	Email Correspondence	National Grid issued a draft Geology and Hydrogeology Assessment Methodology to the Lead Local Flood Authorities (LLFA).

Health and Wellbeing (including Air Quality and Noise and Vibration)

September 2022	Email Correspondence	National Grid issued the Health and Wellbeing Assessment Methodology to all host authorities.
September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Noise and Vibration assessment for review and comment.
September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Air Quality assessment for review and comment.
September 2023	Technical Note	National Grid issued a Health and Wellbeing technical note on the proposed approach to the Environmental Impact Assessment (EIA), including guidance, study area, scope, and assessment methodology.
September 2023	Email Correspondence	NCC requested consideration of mental health during operation. NCC also requested that baseline data should be provided to aid further levels of detail where possible.
September 2024	Meeting	National Grid held a meeting to discuss and agree the proposed assessment scope and methodology for the Health and Wellbeing chapter of the ES.
October 2024	Technical note	National Grid issued a refreshed Health and Wellbeing technical note on the proposed approach to the Environmental Impact Assessment (EIA), including guidance, study area, scope, and assessment methodology.
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the health and wellbeing section of the Environmental Statement.

Historic Environment

July 2022	Email Correspondence	National Grid issued a document detailing the scope and methodology for the Historic Environment assessment and baseline to all host authorities and Historic England.
July 2022	Meeting	Historic Environment Thematic Group to discuss the proposed approach for the EIA assessment.
September 2022	Meeting	National Grid presented an updated approach to defining study areas, scoping of walkover and scoping of historic buildings to consider in the assessment, in response to feedback received.

Date	Format	Topic/Description
January 2023	Email Correspondence	National Grid issued the plans showing the proposed viewpoint locations for landscape and heritage ahead of the Thematic Group meeting in February 2023 to all host authorities.
February 2023	Meeting	National Grid held a meeting with all host authorities to discuss landscape and heritage viewpoints.
June 2023	Technical Note	National Grid issued a technical note to Historic England and host authorities to agree methodology for the selection of viewpoints for the Historic Environment assessment.
September 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed heritage viewpoint methodology with all host authorities and Historic England.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed locations of heritage viewpoints with host authorities and Historic England. Feedback was received from stakeholders regarding proposed viewpoints and additional viewpoints were proposed.
November 2023	Meeting	Meeting with archaeological advisors to discuss the approach to geophysical survey and trial trenching.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss proposed locations of heritage viewpoints with all host authorities and Historic England. Viewpoint locations shared in PDF and shapefile.
January 2024	Email Correspondence	National Grid shared the updated viewpoints (including Zone of Theoretical Visibility (ZTV)) for feedback from all host authorities, Natural England and Historic England.
March 2024	Meeting	Archaeology Working Group Meeting with archaeological advisor from NCC in attendance.
March 2024	Technical Note	National Grid shared the Historic Environment Desk-Based Assessment for review and comment.
March 2024	Technical Note	National Grid shared the updated Written Scheme of Investigation (WSI) for Geophysical Surveys with the Archaeology Working Group Members.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
May 2024	Technical Note	National Grid shared the WSI for Monitoring GI works under archaeological supervision with Archaeology Working Group Members for review and approval.
June 2024	Technical Note	National Grid shared the overarching WSI for the Archaeological Trial Trenching with the Archaeology Working Group Members for review and approval.

Date	Format	Topic/Description
June 2024	Technical Note	National Grid shared the Site Specific WSI for the EACN (Site 001) with the Archaeology Working Group Members for information.
June 2024	Meeting	Archaeology Working Group Meeting.
July 2024	Meeting	Archaeology Working Group Meeting.
August 2024	Meeting	Archaeology Working Group Meeting.
September 2024	Meeting	Archaeology Working Group Meeting
October 2024	Meeting	Historic Environment Thematic Group Meeting.
October 2024	Meeting	Archaeology Working Group Meeting.
October 2024	Email Correspondence	National Grid shared the Setting survey locations with stakeholders.
November 2024	Meeting	Technical focus meeting to discuss the ongoing archaeology work on site.
December 2024	Meeting	Archaeology Working Group Meeting
December 2024	Email Correspondence	National Grid re-issued the overarching Written Scheme of Investigation (WSI) for Archaeological Trial Trenching
January 2025	Meeting	Archaeology Working Group Meeting
February 2025	Email Correspondence	National Grid issued Historic Environment (HE) Viewpoints information
February 2025	Meeting	Archaeology Working Group Meeting
February 2025	Meeting	Historic Environment Thematic Group Meeting regarding Historic Environment Viewpoints
February 2025	Email Correspondence	National Grid issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment
February 2025	Meeting	Meeting to discuss draft Heritage Baseline Report
March 2025	Email Correspondence	National Grid issued updated Historic Environment Viewpoints information
March 2025	Meeting	Archaeology Working Group Meeting
April 2025	Email Correspondence	National Grid issued the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project
April 2025	Meeting	Archaeology Working Group Meeting

Date	Format	Topic/Description
May 2025	Meeting	Technical focus meeting to discuss ongoing archaeology work on site
June	Technical Note	National Grid shared the Archaeological Fieldwork Summary.
June 2025	Meeting	Archaeology Working Group Meeting
July 2025	Meeting	Archaeology Working Group Meeting
August 2025	Meeting	Archaeology Working Group Meeting
September 2025	Meeting	Archaeology Working Group Meeting
September 2025	Technical note	National Grid shared Priority Geophys Prelim Grayscale with stakeholders for consideration
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the heritage section of the Environmental Statement
October 2025	Meeting	Archaeology Working Group Meeting
November 2025	Meeting	Archaeology Working Group Meeting
November 2025	Technical Note	National Grid shared shapefiles of the Phase 2 Geophysical Survey with the priority survey areas
December 2025	Technical Note	National Grid shared the WSI for the Phase 2 Geophysical Survey
January 2026	Meeting	Archaeology Working Group Meeting
January 2026	Meeting	Meeting to discuss the heritage aspects of the Statement of Common Ground.
February 2026	Email Correspondence	National Grid shared the Supplementary Environmental Information submitted to Planning Inspectorate on the geophysical survey and archaeological trial trenching completed to date with the Archaeology Working Group Stakeholders.
February 2026	Meeting	Archaeology Working Group

Hydrology, Land Drainage and Flood Risk

June 2022	Email Correspondence	National Grid circulated the draft Hydrology and Land Drainage Assessment Methodology for review and discussion ahead of the Hydrology and Land Drainage Thematic Group.
July 2022	Meeting	National Grid presented the EIA approach at the Hydrology and Land Drainage Thematic Group to the Environment Agency and all host authorities.

Date	Format	Topic/Description
May 2023	Technical Note	National Grid issued a technical note for comment, which set out the approach to preparing the Flood Risk Assessment (FRA).
July 2023	Email Correspondence	Response to comments received on the technical note setting out the approach to preparing the FRA.
March 2024	Technical Note	National Grid issued the Flood Risk Assessment Screening Report for comment.
September 2024	Technical Note	National Grid issued the Works In, Over and Under Watercourses Technical Note and the Surface Water Management Principles Technical Note.
October 2024	Meeting	National Grid held a meeting to discuss comments from stakeholders on the principles for surface water drainage design for above ground infrastructure and watercourse crossing designs for the Project.
October 2024	Meeting	Hydrology and Land Drainage Thematic Group Meeting
January 2025	Email Correspondence	National Grid issued the Draft Flood Risk Assessment (FRA) for agreement/comment
January 2025	Meeting	National Grid held a meeting to discuss comments raised from the draft Flood Risk Assessment (FRA)
March 2025	Email Correspondence	National Grid issued Draft Flood Risk Assessment (FRA) for agreement/comment
September 2025	Meeting	Optional thematic group meeting to discuss feedback on the hydrology and land drainage section of the Environmental Statement

Landscape and Visual

July 2022	Meeting	Landscape and Visual Thematic Group Meeting. National Grid shared the Landscape and Visual Impact Assessment (LVIA) Methodology and Arboricultural Assessment Methodology for review.
January 2023	Email Correspondence	National Grid issued plans showing proposed viewpoint locations for review and comment to all host authorities.
February 2023	Meeting	National Grid held a Landscape and Visual Thematic Group Meeting to discuss proposed viewpoint locations in Norfolk. National Grid sought agreement on the viewpoint locations to include in the Preliminary Environmental Information Report (PEIR) and the ES.
April 2023	Meeting	National Grid held a meeting to discuss stakeholder's feedback on EIA viewpoints previously shared.
May 2023	Meeting	National Grid presented and discussed the responses to the feedback on the viewpoint locations received from the

Date	Format	Topic/Description
		February meeting. Stakeholders (including NCC) provided feedback on updated and additional viewpoint locations at the meeting and in subsequent correspondence.
May 2023 – March 2024	Email Correspondence	National Grid shared information, responded to further feedback on viewpoint locations received from the May 2023 meeting, and reviewed subsequent feedback received up to March 2024 with the aim to agree viewpoint locations for the PEIR and ES (based on the information available at this date).
August 2023	Email Correspondence	National Grid issued wirelines and photomontages and proposed the approach to ZTV mapping for comment.
January 2024	Email Correspondence	National Grid shared the updated landscape viewpoints (and the ZTV) and sought feedback from all host authorities.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
September 2024	Email Correspondence	National Grid shared the draft Landscape and Visual Methodology, Proposed LVIA Viewpoints (excel spreadsheet) and Proposed LVIA Viewpoints (map) ahead of the Landscape Thematic Group Meeting.
September 2024	Meeting	National Grid held a Landscape Thematic Group Meeting to find agreement on the LVIA methodology and the format/presentation of photomontages and/or wirelines which will form part of the DCO application.
September 2024	Email Correspondence	National Grid shared the shapefiles for the landscape viewpoints and order limits with NCC and other stakeholders following the Landscape Thematic Group Meeting.
September 2024	Email Correspondence	National Grid shared the draft Outline LEMP and Sample Mitigation Drawings ahead of the draft Outline LEMP and Outline CoCP discussion.
October 2024	Meeting	National Grid held a focus meeting to discuss the National Landscape.
October 2024	Email Correspondence	National Grid shared the Draft mitigation drawings with stakeholders
October 2024	Email Correspondence	National Grid shared the National landscape setting study with stakeholders
October 2024	Email Correspondence	National Grid shared updated view point information data following from the landscape thematic workshops
December 2024	Meeting	Meeting to agree photography locations and photomontages for the ES

Date	Format	Topic/Description
March 2025	Email Correspondence	National Grid issued an update on LVIA Viewpoints and Methodology
October 2025	Meeting	National Grid hosted an optional thematic meeting to discuss any questions relating to the Environmental Statement.
January 2026	Meeting	Meeting to discuss the LVIA aspects of the Statement of Common Ground.
Socio-economics, Recreation and Tourism		
July 2022	Email Correspondence	National Grid issued the assessment methodology to stakeholders for review ahead of the Thematic Group Meeting in July 2022.
July 2022	Meeting	National Grid held a Socio-economic, Recreation and Tourism Thematic Group Meeting to seek feedback on the proposed approach to the Socio-economics, Recreation and Tourism assessment prior to formal submission of the Scoping Report to the Planning Inspectorate.
June 2023	Technical Note	National Grid issued a Technical Note setting out the study area and methodology for assessing businesses where visual impacts are a potential operational consideration, and PRoW during construction and operation.
August 2023	Meeting	National Grid held a Socio-economic, Recreation and Tourism Thematic Group Meeting to discuss the study area and methodology for assessing businesses.
April 2024	Technical Note	National Grid shared an updated technical note with all host authorities to demonstrate how their feedback had been considered in developing the PEIR.
September 2024	Meeting	Meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
November 2024	Meeting	National Grid held a follow up meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
March 2025	Email Correspondence	National Grid issued the third Technical Note for Socio-economics, Recreation and Tourism
September 2025	Meeting	National Grid held an optional thematic group meeting to discuss the Environmental Statement.

Date	Format	Topic/Description
Traffic and Transport		
June 2022	Technical Note	National Grid issued a Technical Note setting out the proposed Traffic and Transport assessment methodology.
July 2022	Meeting	National Grid held the Local Highway Authority Thematic Group Meeting to discuss the proposed EIA methodology for the Traffic and Transport assessment.
September 2022	Meeting	National Grid held a Local Highway Authority Thematic Group Meeting.
December 2022	Meeting	National Grid held a Transport Working Group to discuss the assessment of routes for construction traffic.
August 2023	Meeting	National Grid held a Transport Working Group to discuss the highways assessment and methodology, survey requirements, road safety audit requirements and trip regeneration methodology.
August 2023	Meeting	Meeting discussing link sensitivity, traffic counts, Abnormal Indivisible Loads (AILs), and data and underlying assumptions behind traffic and workforce calculations.
September 2023	Meeting	National Grid held a Transport Working Group Regional Meeting.
November 2023	Meeting	National Grid held a Transport Working Group meeting with the Local Highways Authorities.
November 2023	Meeting	National Grid held a PRoW Thematic Group Meeting.
January 2024	Meeting	National Grid discussed the Draft Outline Construction Traffic Management Plan (CTMP) (document reference 7.3) at the Transport Working Group Meeting.
March 2024	Meeting	National Grid held a Transport Working Group Regional Meeting to discuss project updates and reviews of work to date, the transport assessment in the PEIR and primary access routes.
April 2024	Meeting	National Grid held a Transport Working Group Meeting to discuss updates to the transport assessment, multi-modal transport considerations and AIL routing with the local highways authorities (including NCC).
June 2024	Meeting	National Grid held a Transport Working Group Regional Meeting to discuss statutory consultation, sensitive junctions, AIL routing, updates on the multi-modal report and road safety audit process, speed surveys, and visibility splays, mitigation and traffic management.

Date	Format	Topic/Description
July 2024	Email Correspondence	Proposed AIL Routes issued for comment.
July 2024	Meeting	National Grid held a Transport Working Group Regional Meeting. Discussed planning applications and impact of access to Norwich Substation and need to understand duration of works/mitigation
August 2024	Meeting	National Grid held a Transport Working Group Meeting. Discussion over DCO projects that may overlap the Project. Discussion held on staff worker movements and sensitivity of junctions in Norfolk.
August 2024	Meeting	Meeting to discuss the PRoW survey locations.
September 2024	Meeting	National Grid held a Transport Working Group Regional Meeting. General structure and content of Transport Assessment (TA) was presented. National Grid provided an overview of the initial capacity assessment methodology using.
October 2024	Meeting	National Grid held a Transport Working Group Meeting.
November 2024	Meeting	National Grid held a LHA Engagement Meeting to discuss potential changes following statutory consultation, visibility splays and traffic management methodology, access for existing utilities and ALLs.
January 2025	Meeting	National Grid held a Transport Working Group Regional Meeting. Presented examples of the likely environmental mitigation measures for junctions and Primary Access Routes predominately where walker, cyclist and horse rider (WCH) Amenity.
February 2025	Email Correspondence	National Grid issued the Mitigation and Junction RAG Strategy
February 2025	Email Correspondence	National Grid issued the Draft Transport Assessment and Figures
March 2025	Meeting	Additional Institute of Environmental Management and Assessment (IEMA) Mitigation Meeting. Presented examples of the likely environmental mitigation measures following draft ES assessment of effects on Primary Access Routes predominately for WCH Amenity.
March 2025	Meeting	National Grid held a Regional Stakeholder Meeting with NCC. National Grid's position on various elements of the traffic and transport and highways design clarified.
April 2025	Meeting	National Grid held a NCC Highway Mitigation Workshop. Highway mitigation proposals on Wymondham Road were discussed.

Date	Format	Topic/Description
April 2025	Meeting	National Grid held a Regional Stakeholder Meeting with NCC. AIL process, routes and agreement on approach sought ahead of DCO.
April 2025	Meeting	National Grid held a NCC workshop to discuss the Work in Progress Transport Assessment. NCC comments on the draft document were discussed.
May 2025	Meeting	National Grid held a Regional Stakeholder Meeting with NCC. The proposed Statement of Common Ground and principals for Traffic Regulation Orders were discussed.
June 2025	Meeting	National Grid held a Regional Stakeholder Meeting with NCC. Progress with Road Safety Audits, Statements of Common Ground, and Traffic Modelling were discussed.
<u>July 2025</u>	<u>Meeting</u>	<u>National Grid held a Local Highway Authority Thematic Group Meeting with Norfolk County Council.</u>
<u>August 2025</u>	<u>Meeting</u>	<u>National Grid held a Regional Stakeholder Meeting with Norfolk County Council present. Progress with Road Safety Audits, Traffic Modelling and DCO Documentation were discussed.</u>
<u>September 2025</u>	<u>Meeting</u>	<u>National Grid held a Local Highway Authority Thematic Group Meeting with Norfolk County Council.</u>
<u>October 2025</u>	<u>Meeting</u>	<u>National Grid held a Regional Stakeholder Meeting with Norfolk County Council present. Progress with Road Safety Audits, Statements of Common Ground, and Traffic Modelling were discussed.</u>
<u>November 2025</u>	<u>Meeting</u>	<u>National Grid held a Local Highway Authority Thematic Group Meeting with Norfolk County Council.</u>
<u>January 2026</u>	<u>Meeting</u>	<u>National Grid held a meeting with Norfolk County Council to discuss further discuss Construction Traffic Flows and Statements of Common Ground matters and updated positions from NCC.</u>
<u>February 2026</u>	<u>Meeting</u>	<u>National Grid held a meeting with Norfolk County Council to discuss further discuss Statements of Common Ground matters and updated positions from NCC and National Grid.</u>

3. Matters Agreed, Not Agreed or Under Discussion

3.1 Overview

- 3.1.1 This chapter details the matters relevant to NCC which have been agreed, not agreed or are under discussion between the parties. Matters are arranged by topic (using broad headings, or EIA chapter headings where appropriate) and each matter is given a unique reference number to aid identification.
- 3.1.2 The red, amber, green status shows the level of agreement with NCC. Descriptions of the different levels are summarised in Table 3.1.

Table 3.1 Agreement status for matters presented in Section 3

Status	Description
Not Agreed	Indicates a final position, where it has not been possible to resolve the issue to the agreement of both parties and there remains a difference of opinion.
Under Discussion	Indicates where issues are the subject of active on-going discussion.
Agreed	Indicates where an issue has been agreed or resolved satisfactorily to the agreement of both parties.

- 3.1.3 Engagement will continue as the Project develops and progresses through the various stages of the DCO process.
- ~~3.1.4 Sections that remain highlighted in yellow within these tables show points where both parties will seek to discuss and where possible agree a position in due course. The parties have been unable to do so at this stage because the relevant information is still being authored ahead of submission of the DCO application. These points will be the subject of ongoing discussion with stakeholders once the Environmental Statement and other relevant documentation is published.~~
- ~~3.1.5~~3.1.4 Table 3.3 to Table 3.13 provides the matters agreed, not agreed or under discussion in relation to the various topics.

3.2 Project development, description and design

Table 3.2 Matters Agreed, Not Agreed or Under Discussion in relation to project development, description and design matters

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
Strategic options/needs case				
3.2.1	Needs case	Norwich to Tilbury is being proposed because the existing network in East Anglia doesn't have sufficient capacity to manage the expected (and in some cases, contracted) increase in offshore wind farms (and interconnectors) needing to connect to the grid as part of the Government's target of reaching net zero by 2050. The project sits alongside other work to reinforce and upgrade the existing network in East Anglia. Norwich to Tilbury is listed as a key project in Appendix 2 of the NESO Clean Power 2030 Report.	NCC Response to Statutory Consultation (June 2024): The need for upgrading the electricity transmission network at both the national and local level is recognised and this proposal would assist in meeting the Government's objectives on net zero and delivering offshore wind power.	Agreed
3.2.2	Project timing	Timing for the project is driven by the needs case – when offshore wind farms are contracted to connect to the UK network – the first of which are contracted to connect in 2030. National Grid is legally obliged (under our Transmission Owner License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers) by NESO. Appendix 2 of the NESO Clean Power 2030 Report shows that the constraint costs associated with a delay to the project timing as being between £2.7 and £2.8 billion.	NCC Response to Statutory Consultation (June 2024): The Hiorns' Report commissioned by Norfolk, Suffolk and Essex County Councils concluded that while there is a demonstrable need for additional capacity to the existing network arising from new offshore wind generation and low carbon energy generation in the region (Sizewell C), it does not support the current delivery timetable of 2030 outlined by National Grid; and instead suggests additional capacity would not be needed until 2035+ Furthermore the Report suggests that the cost of the offshore	Under discussion Not agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
			alternatives have been over-estimated by National Grid.	
3.2.3	Onshore route	<p>An onshore route allows for greater energy capacity and connectivity to feed into the grid. In assessing offshore options to deliver the same capacity as an onshore overhead line, we would need to build three subsea cables and associated infrastructure, which would add significant cost and not meet the needs case for Norwich to Tilbury.</p> <p>Updated Strategic Options and Backcheck Review documents published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including offshore alternatives.</p>	<p>The County Council's position (2024) remains as set out to previous consultation rounds and supports in principle an offshore option; or where this proves undeliverable then support should be given towards an onshore underground option</p> <p>as such the County Council continues its objection to the current proposal for an overhead power line (400 kV) between Norwich and Tilbury.</p>	Under discussion
3.2.4	Predominantly overhead line route	<p>Norwich to Tilbury has been designed in line with policy statement EN-5 (which covers the development of new energy infrastructure) which concludes that in most cases, the government expects that overhead lines will be appropriate and should be used as standard to reinforce the grid.</p> <p>Updated Strategic Options and Backcheck Review documents published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including underground alternatives.</p> <p>The work undertaken shows that undergrounding, including using High Voltage Direct Cables (HVDC), would be significantly more expensive and have environmental impacts and present engineering challenges. Due to the higher price that would be involved in an underground alternative, we do not</p>	<p>NCC Response to Targeted Consultations (Feb 2025):</p> <p>Previous comments relating to alternative transmission alternatives have not been addressed in the current consultation and as such the County Council continues its objection to the current proposal for an overhead power line (400 kV) between Norwich and Tilbury. The County Council continues to support in principle either: an offshore option; or if this is proved undeliverable then an onshore option which is undergrounded.</p>	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		believe that this would be the most suitable option as all costs ultimately go onto domestic energy bills.		
Project development process - Design				
3.2.5	Waveney Valley	At statutory consultation in 2024, National Grid presented proposals for an overhead line across the Waveney Valley, along with an underground cable alternative for community and stakeholder feedback. After considering feedback, and the findings of our ground investigation (GI) and environmental surveys, the decision was made to proceed with an overhead line in this area. This decision considered a range of factors, including potential environmental impacts, planning policy, cost to consumers and alternate installation techniques for underground cables in response to GI surveys and the Waveney and Little Ouse Recovery project.	<p><u>NCC is deeply disappointed that the use of underground cables through the Waveney Valley cannot be achieved without environmentally disruptive, technically uncertain or disproportionately costly techniques. It is NCC's strong view that the absence of an underground alternative for the Waveney Valley leaves a hole in the project's mitigation for landscape and visual effects which urgently needs to be filled. The failure of a feasible undergrounding option does not absolve the applicant from the need to consider ways in which impacts can be reduced, mitigated or compensated for.</u></p> <p><u>NCC would ask that the applicant provide more detail to justify the statement at paragraph 4.6.16 of the Design Development Report (regarding WVA) that tunnelling (as opposed to horizontal directionless drilling or driven pipe methods) 'would be possible but at a level of cost not considered to be compatible with National Grid's duties to be economical' NCC would welcome discussions with the applicant to explore these opportunities.</u>NCC</p>	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
			<p>Response to Targeted Consultations (Feb 2025):</p> <p>NCC is extremely disappointed that plans for a potential "Waveney Valley Alternative" involving the undergrounding of the proposed power line under the River Waveney to the west of Diss have been dropped by National Grid earlier in the year in favour of an above ground solution. National Grid has provided little detailed evidence as to why the above option has been dropped and this now raises specific concerns regarding the impact of the project in this very sensitive area.</p>	
3.2.6	<p><u>Brick Kiln Lane County Wildlife Site</u></p>	<p>The proposed route of the overhead line avoids woodland impacts within the Brick Kiln County Wildlife Site (CWS) further to the east, but as a result unavoidably increases the effects on the adjacent area of woodland within the Tas Valley. It will be necessary to undertake some tree removal within the woodland to provide clearance for the overhead line, but this will be limited to only the amount of tree cover necessary to meet safe electrical clearance requirements. Typically, tree removal is potentially required close to the alignment (20 m to either side of the centreline) with canopy management (rather than tree removal) for a further 8 m beyond the 20 m.</p> <p>In addition to the 2023, 2024 and 2025 Design Development Reports, further information can be found in the Trees and Hedgerows to be Removed Plans (Section A, Sheet 8 of 13, [APP-048]) and Consultation Report.</p>	<p>NCC has been made aware of disagreement over the alignment of the cable route at Meadow Wood near Bunwell which is detailed in section 4.4 of the Design Development Report. The alignment has been routed to avoid the Brick Kiln Lane County Wildlife Site but now is set to over sail a woodland which contains a number of individual trees of high arboricultural value. NCC is concerned that the presence of overhead electrical cables will mean that a considerable number of valuable trees are removed or cut back for maintenance or safety reasons. It is not clear where in the ES the</p>	<p><u>Under discussion</u></p>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
			<u>impacts on this location are reckoned, or, given that there appear to be feasible alternatives presented in the Design Development Report, where the relative harms of these alternative alignments are explicitly weighed against each other.</u>	
Project development process - Consultation				
3.2. 76	2022 non-statutory consultation	Non-statutory consultation took place between 21 April 2022 – 16 June 2022. Details of this consultation are outlined in the Consultation Strategy , and responses to feedback received during consultation are included in the Feedback Report . The non-statutory consultation was undertaken in accordance with the published Consultation Strategy .	<u>NCC agree that consultation was undertaken in accordance with the published Consultation Strategy.</u>	Under discussion <u>Agreed</u>
3.2. 87	2023 non-statutory consultation	Non-statutory consultation took place between 27 June 2023 – 21 August 2023. Details of this consultation are outlined in the Consultation Strategy , and responses to feedback received during consultation are included in the Feedback Report . The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.	<u>NCC agree that consultation was undertaken in accordance with the published Consultation Strategy.</u>	Under discussion <u>Agreed</u>
3.2. 98	2024 statutory consultation	Statutory Consultation took place from Wednesday 10 April 2024 to 26 July 2024 (the end date was extended from 18 June 2024 due to the general election.) Details of this consultation are outlined in the Statement of Community Consultation (SoCC) . Statement of Community Consultation (SoCC) . Responses to feedback received during statutory consultation are <u>will be made</u> available at DCO submission within the Consultation Feedback Report [APP-066] .	<u>NCC agree that consultation was undertaken in accordance with the Statement of Community Consultation (SoCC)</u>	Under discussion <u>Agreed</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		The statutory consultation was undertaken in accordance with the published SoCC.		
3.2.10 9	2025 targeted consultation	<p>Targeted consultations for Norfolk took place from 30 January 2025 – 3 March 2025. Details of these consultations are outlined in the Targeted Consultation Strategy and associated targeted consultation leaflets and environmental implications of change documents. Responses to feedback received during targeted consultation are will be made available at DCO submission within the Consultation Feedback-Report [APP-066].-</p> <p>The targeted consultations were undertaken in accordance with the published Targeted Consultation Strategy.</p> <p>The approach to targeted consultation was undertaken in accordance with Section 50 of the Planning Act 2008 and associated guidance: Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects (April 2024).</p>	NCC agree that consultation was undertaken in accordance with the Targeted Consultation Strategy	Under discussion Agreed
Other matters as required				
3.2.11 40	Consideration of power delivery to Norfolk to support housing and employment growth	There is a need to reinforce the existing high voltage electricity network in the East Anglia region. It does not currently have the capability needed to transport reliably and securely the electricity that will be generated and connected to the electricity transmission network by 2030, while working to the required standards. The Project would benefit the UK as a whole, including local communities, by enabling the connection of new sources of renewable energy and in doing so provide greater energy security and resilience to the Norfolk energy network.	NCC seek assurances from National Grid that in the event of an onshore option being taken forward there needed to be demonstrable benefits for Norfolk in terms of providing power to communities and business to support planned growth. As currently set out, the Project would see energy passing through the County with none of the energy being used in Norfolk (2024) National Grid should engage with both NCC and UK Power Networks	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.2.12 44	Community benefits	<p><u>Socio-economic impacts on the local economy and the tourism sector are assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. The chapter concludes that there would be no significant impacts on the local economy as a result of the Project.</u></p> <p><u>In addition to the ES, the Applicant is committed to providing a coordinated local and regional approach to community benefits. The Government has published its March 2025 the government announced guidance on community funds for delivering community benefit packages for communities hosting new, onshore transmission infrastructure (DESNZ, 2025). The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network.</u></p>	<p>as part of the above project to consider what opportunities there are to provide power to Norfolk; and what additional infrastructure may be needed to secure such benefits.</p> <p>It is felt that this should be undertaken in conjunction with the County Council's preparation of an Energy Plan; and National Grid should contribute towards the cost of such a Plan, particularly given that other major National Grid Projects are coming forward elsewhere in the Count</p> <p>NCC Response to Targeted Consultations (Feb 2025):</p> <p>National Grid have not addressed in this consultation round compensation for those residents and businesses adversely affected by the proposed project either during or after construction. It is understood that Government is still considering the wider compensation and community benefits arrangement needed to address the upgrading of the transmission network.</p>	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>projects. This would be delivered outside the development consent process, since it is guidance is clear that community benefit matters should be separate from, and not a material consideration in <u>the decision on the Project or a matter to be secured as part of the Development Consent Order</u> (, the planning process. Outside of the DCO), as per the Community Funds for Transmission Infrastructure: Guidance (DESNZ, 2025) 14.. Therefore, any community benefit or investment would be captured under the process, National Grid <u>Community Grant Scheme and dealt</u> will work with stakeholders to understand the opportunity and delivery of this funding, in line with <u>separately to the EIA</u> <u>guidance.</u></p>		

3.3 Ecology and Biodiversity

Table 3.3 Matters Agreed, Not Agreed or Under Discussion in relation to Ecology and Biodiversity

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.3.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Ecology and Biodiversity assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) and Section 8.2 of Chapter 8 (Ecology and Biodiversity) of the ES.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	<p>review <u>NCC position pending sight of the ES</u></p>	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Approach and Methods				
3.3.2	Study area	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 8.4 of Chapter 8 (Ecology and Biodiversity) of the ES.	NCC position pending review <u>review</u> of the ES	Under discussion
3.3.4	Assessment Methodology	The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
	Survey Methodology	The methodology for assessing Ecology and Biodiversity relevant to NCC was agreed through a technical note outlining survey methods and the scope of surveys for species outside the remit of Natural England.	The methodology for assessing Ecology and Biodiversity relevant to NCC was agreed through a technical note outlining survey methods and the scope of surveys for species outside the remit of Natural England.	Agreed
3.3.5	Key parameters and assumptions	Key parameters and assumptions associated with the Ecology and Biodiversity assessment are summarised in Section 8.4 of Chapter 8 (Ecology and Biodiversity) of the ES. The key parameters and assumptions presented are considered appropriate.	NCC position pending review <u>review</u> of the ES	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Baseline Conditions				
3.3.6	Baseline conditions and receptors	The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of Chapter 8 (Ecology and Biodiversity) of the ES. The baseline conditions and receptors presented are considered appropriate.	NCC position pending <u>reviewsight</u> of the ES	Under discussion
EIA – Embedded, Standard and Additional Mitigation Measures				
3.3.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Ecology and Biodiversity effects, are set out in Section 8.6 of Chapter 8 (Ecology and Biodiversity) of the ES. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>In January 2025, National Grid issued a technical note to all host authorities outlining the protected species proposed mitigation measures for agreement/comment</p> <p>In May 2025, National Grid held a further meeting to discuss comments from an updated proposed mitigation for species outside the remit of Natural England.</p>	NCC position pending <u>reviewsight</u> of the ES	Under discussion
3.3.8	Standard mitigation	Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of Chapter 8 (Ecology and Biodiversity) of the ES and set out in the Outline CoCP [document reference 7.2]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC position pending <u>reviewsight</u> of the ES	Under discussion
3.3.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 8.6 of Chapter 8 (Ecology and Biodiversity) of the ES. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC position pending <u>reviewsight</u> of the ES	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Assessment Conclusions				
3.3.10	Construction effects	The assessment of effects during construction is presented in Section 8.7 of Chapter 8 (Ecology and Biodiversity) of the ES. The assessment of effects during construction presented is considered appropriate.	NCC position pending review sight of the ES	Under discussion
3.3.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 8.7 of Chapter 8 (Ecology and Biodiversity) of the ES. The assessment of effects during operation (and maintenance) presented is considered appropriate.	NCC position pending review sight of the ES	Under discussion
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.3.12	Outline CoCP	<p>The Outline CoCP includes all relevant construction related mitigation measures specified in Chapter 8 (Ecology and Biodiversity) of the ES and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held in October 2024 to agree on the structure for the Outline CoCP.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP.</p> <p>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</p>	<p><u>NCC is satisfied that the outline Code of Construction Practice (“OCoCP”) is written in line with the requirements of the model Construction Environmental Management Plan condition at D.4.1 of BS 42020:2013 (Biodiversity — Code of practice for planning and development).</u> NCC position pending sight of the ES</p>	Under discussion
3.3.13	Outline LEMP	<p>The LEMP includes all relevant operational related mitigation measures specified in Chapter 8 (Ecology and Biodiversity) of the ES and is appropriate.</p> <p>Meeting held in October 2024 to agree on the structure for the Outline LEMP.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline LEMP.</p>	NCC position pending review sight of the ES	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		A further iteration of the Outline LEMP was issued in May 2025 following the meeting and feedback in writing.		
Other matters as required				
3.3.14	Biodiversity Net Gain (BNG)	National Grid will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. <u>The Biodiversity Net Gain Report [APP-299] sets out the approach to BNG.</u> Offsite BNG will be <u>secured by a legal agreement and</u> delivered through collaboration with partners and purchased from commercially registered providers. National Grid shared the Biodiversity Net Gain strategy with stakeholders in January 2025.	<u>With regard to Biodiversity Net Gain ("BNG"), the project has stated that 12.5% of the habitats within the order limits have been assessed under the condition assessment. This should be increased to meaningfully contribute to the BNG assessment to generate a realistic BNG unit value</u>	Under discussion
3.3.15	Arboriculture Impact Assessment (AIA)	National Grid issued the draft AIA in March 2025.		Under discussion

3.4 Contaminated Land, Geology and Hydrogeology

Norfolk County Council's positions throughout this table relate to minerals. NCC has no comments regarding Contaminated Land and Hydrogeology.

Table 3.4 Matters Agreed, Not Agreed or Under Discussion in relation to Contaminated Land, Geology and Hydrogeology

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.4.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Contaminated Land, Geology and Hydrogeology assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) and Section 9.2 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	NCC position pending <u>review</u> sight of the ES	Under discussion
EIA – Approach and Methods				
3.4.2	Study area	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.4.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 9.4 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES.	<u>NCC confirmed their agreement on this matter during a call held February 2026.</u> NCC position pending sight of the ES	Under discussion Agreed
3.4.4	Assessment methodology	The methodology for assessing Contaminated Land, Geology and Hydrogeology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The methodology for assessing Contaminated Land, Geology and Hydrogeology was agreed through the EIA Scoping Report and Scoping	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
			Opinion received from the Planning Inspectorate. NCC noted in the Statutory Consultation Responses that: <i>having examined the information within the PEIR and Appendix 9.2; the Mineral Planning Authority agrees with the methodology used to determine mineral safeguarding issues.</i>	
3.4.5	Key parameters and assumptions	Key parameters and assumptions associated with the Contaminated Land, Geology and Hydrogeology assessment are summarised in Section 9.4 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES. The key parameters and assumptions presented are considered appropriate.	<u>NCC confirmed their agreement on this matter during a call held February 2026.</u> NCC position pending sight of the ES	Under discussion <u>Agreed</u>
EIA – Baseline Conditions				
3.4.6	Baseline conditions and receptors	The baseline conditions and receptors for Contaminated Land, Geology and Hydrogeology are presented in Section 9.5 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES. The baseline conditions and receptors presented are considered appropriate.	<u>NCC confirmed their agreement on this matter during a call held February 2026.</u> NCC position pending sight of the ES	Under discussion <u>Agreed</u>
EIA – Embedded, Standard and Additional Mitigation Measures				
3.4.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Contaminated Land, Geology and Hydrogeology effects, are set out in Section 9.6 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES. Embedded mitigation is	<u>NCC confirmed that they do not think mitigation is necessary for this topic during a call held February 2026.</u> NCC position pending sight of the ES	Under discussion <u>Not applicable</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		considered appropriate and adequate, in terms of its nature and scale, to address potential effects.		
3.4.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 9.6 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES and set out in the Outline CoCP [document reference 7.2]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	<u>NCC confirmed that they do not think mitigation is necessary for this topic during a call held February 2026.NCC position pending sight of the ES</u>	Under discussion Not applicable
3.4.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 9.6 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	<u>NCC confirmed that they do not think mitigation is necessary for this topic during a call held February 2026.NCC position pending sight of the ES</u>	Under discussion Not applicable
EIA – Assessment Conclusions				
3.4.10	Construction effects	The assessment of effects during construction is presented in Section 9.7 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES. The assessment of effects during construction presented is considered appropriate.	<u>NCC confirmed their agreement on this matter during a call held February 2026.NCC position pending sight of the ES</u>	Agreed Under discussion
3.4.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 9.7 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES. The assessment of effects during operation (and maintenance) presented is considered appropriate.	<u>NCC confirmed their agreement on this matter during a call held February 2026.NCC position pending sight of the ES</u>	Under discussion Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.4.12	Outline CoCP	The Outline CoCP includes all relevant construction mitigation measures specified in Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES and is	<u>NCC confirmed their agreement on this matter during a call held February</u>	Agreed Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>appropriate for managing construction impacts from the Project.</p> <p>Meeting held on in October 2024 to agree on the structure for the Outline CoCP.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP.</p> <p>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</p>	<p>2026 NCC position pending sight of the ES</p>	

Other matters as required

3.4.13	<p><u>Norfolk Minerals and Waste Local Plan</u></p>	<p><u>All policy included in the Environmental Statement was current as of 1 April 2025, to allow sufficient time to complete the appropriate assessments and draft the Planning Statement prior to submission of the DCO application. Noting NCC's updated Minerals Plan wasn't adopted until May 2025, we have included this plan in the Policy Compliance Tracker, being submitted to the DCO examination at Deadline 1. National Grid can confirm that the updated Plans inclusion would not have affected the conclusions in the ES or its appendices.</u></p>	<p><u>NCC wrote to the applicant on 15 October 2025 to seek changes to Chapter 9 and Figure 9.3 of the Environmental Statement to reflect the fact that the Norfolk Minerals and Waste Local Plan ("NM&WLP") was adopted on 20 May 2025 and supersedes the policy which is quoted in the ES as submitted. This seems to us to be a straightforward factual correction so we trust that the applicant is willing to make the necessary changes.</u></p>	
--------	---	---	--	--

3.5 Health and Wellbeing (including Air Quality and Noise and Vibration)

Table 3.5 Matters Agreed, Not Agreed or Under Discussion in relation to Health and Wellbeing

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.5.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Health and Wellbeing assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context), Section 10.2 of Chapter 10 (Health and Wellbeing), Section 7.2 of Chapter 7 (Air Quality) and Section 14.2 of Chapter 14 (Noise and Vibration) of the ES. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	<u>NCC confirmed their agreement on this matter during a call held February 2026. NCC position pending sight of the ES</u>	<u>Agreed</u> <u>Under</u> <u>discussion</u>
EIA – Approach and Methods				
3.5.2	Study area	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.5.3	Data sources	Sufficient desktop data has been collected to inform the assessment as presented within Section 10.4 of Chapter 10 (Health and Wellbeing), Section 7.4 of Chapter 7 (Air Quality) and Section 14.4 of Chapter 14 (Noise and Vibration) of the ES.	<u>NCC confirmed their agreement on this matter during a call held February 2026. NCC position pending sight of the ES</u>	<u>Agreed</u> <u>Under</u> <u>discussion</u>
3.5.4	Assessment methodology	A meeting was held on the 24th September 2024 to agree the assessment methodology of the Health and Wellbeing ES chapter. National Grid issued the Health and Wellbeing Technical Note – Refreshed Approach on the 9th October 2024.	<u>NCC welcomes the applicant's assessment of mental health impacts and the use of the Mental Wellbeing Impact Assessment Toolkit (2011),</u>	<u>Agreed</u> <u>Under</u> <u>discussion</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
			<p><u>which reflects comments made by NCC Public Health and other consultees earlier in the consultation process. The specific focus on perceptions of health risk associated with EMFs is also welcomed, again reflecting NCC Public Health's previous comments. NCC notes the assessment of impacts at ward level and the methodology used to identify ward vulnerability, which again reflects NCC Public Health's earlier comments. The explicit consideration of vulnerable groups is also supported.</u></p>	
3.5.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with Health and Wellbeing are summarised in Section 10.4 of Chapter 10 (Health and Wellbeing), Section 7.4 of Chapter 7 (Air Quality) and Section 14.4 of Chapter 14 (Noise and Vibration) of the ES. The key parameters and assumptions presented are considered appropriate.</p>	<p><u>NCC confirmed their agreement on this matter during a call held February 2026. NCC position pending sight of the ES</u></p>	<p><u>Agreed</u> <u>Under</u> <u>discussion</u></p>
EIA – Baseline Conditions				
3.5.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Health and Wellbeing are presented in Section 10.5 of Chapter 10 (Health and Wellbeing), Section 7.5 of Chapter 7 (Air Quality) and Section 14.5 of Chapter 14 (Noise and Vibration) of the ES. The baseline conditions and receptors presented are considered appropriate.</p>	<p><u>NCC confirmed their agreement on this matter during a call held February 2026. NCC position pending sight of the ES</u></p>	<p><u>Agreed</u> <u>Under</u> <u>discussion</u></p>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Embedded, Standard and Additional Mitigation Measures				
3.5.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Health and Wellbeing effects, are set out in Section 10.6 of Chapter 10 (Health and Wellbeing), Section 7.6 of Chapter 7 (Air Quality) and Section 14.6 of Chapter 14 (Noise and Vibration) of the ES. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	<u>NCC advised during a call held in February 2026 that they do not consider this applicable for this topic.</u> NCC position pending sight of the ES	<u>Not Applicable</u> <u>Under discussion</u>
3.5.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 10.6 of Chapter 10 (Health and Wellbeing), Section 7.6 of Chapter 7 (Air Quality), Section 14.6 of Chapter 14 (Noise and Vibration) of the ES and set out in the Outline CoCP [document reference 7.2]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	<u>NCC advised during a call held in February 2026 that they do not consider this applicable for this topic.</u> NCC position pending sight of the ES	<u>Not applicable</u> <u>Under discussion</u>
3.5.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 10.6 of Chapter 10 (Health and Wellbeing), Section 7.6 of Chapter 7 (Air Quality) and Section 14.6 of Chapter 14 (Noise and Vibration) of the ES. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	<u>NCC confirmed their agreement with regard to the proposed mitigation relating to EMF's during a call held February 2026.</u> NCC position pending sight of the ES	<u>Agreed</u> <u>Under discussion</u>
EIA – Assessment Conclusions				
3.5.10	Construction effects	The assessment of effects during construction is presented in Section 10.7 of Chapter 10 (Health and Wellbeing), Section 7.7 of Chapter 7 (Air Quality) and Section 14.7 of Chapter 14 (Noise and Vibration) of the ES. The assessment of effects during construction presented is considered appropriate.	<u>NCC confirmed their agreement on this matter during a call held February 2026.</u> NCC position pending sight of the ES	<u>Agreed</u> <u>Under discussion</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.5.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 10.7 of Chapter 10 (Health and Wellbeing), Section 7.7 of Chapter 7 (Air Quality) and Section 14.7 of Chapter 14 (Noise and Vibration) of the ES. The assessment of effects during operation (and maintenance) presented is considered appropriate.	<u>NCC confirmed their agreement on this matter during a call held February 2026.</u> NCC position pending sight of the ES	<u>Agreed</u> Under discussion
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.5.12	Outline CoCP	The Outline CoCP includes all relevant mitigation measures specified in Chapter 10 (Health and Wellbeing), Chapter 7 (Air Quality) and Chapter 14 (Noise and Vibration) of the ES and is appropriate for managing construction impacts from the Project. Meeting held in October 2024 to agree on the structure for the Outline CoCP. Meeting held in March 2025 to discuss the second iteration of the Outline CoCP. A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.	<u>NCC confirmed their agreement on this matter during a call held February 2026.</u> NCC position pending sight of the ES	<u>Agreed</u> Under Discussion
Other matters as required				

3.6 Historic Environment

Comments on Historic Environment for Norfolk County Council relate to archaeology only.

Table 3.6 Matters Agreed, Not Agreed or Under Discussion in relation to Historic Environment

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.6.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) and Section 11.2 of Chapter 11 (Historic Environment) of the ES.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	<p>NCC advised they were in agreement with this matter during a meeting held in January 2026. NCC position pending sight of the ES</p>	<p>Agreed Under discussion</p>
EIA – Approach and Methods				
3.6.2	Study area	<p>The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p> <p>The study area was also agreed through subsequent thematic group meetings where further comments were addressed.</p>	<p>The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p>	<p>Agreed</p>
3.6.3	Data sources	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 11.4 of Chapter 11 (Historic Environment) of the ES.</p>	<p>NCC advised they were in agreement with this matter during a meeting held in January 2026. NCC position pending sight of the ES</p>	<p>Agreed Under discussion</p>
3.6.4	Assessment methodology	<p>The methodology for assessing Historic Environment was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p>	<p>The methodology for assessing Historic Environment was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p>	<p>Agreed</p>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.6.57	Key parameters and assumptions	<p>Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of Chapter 11 (Historic Environment) of the ES. The key parameters and assumptions presented are considered appropriate.</p> <p>In February 2025, National Grid issued Historic Environments (HE) Viewpoints information and held a thematic group meeting on the topic.</p> <p>In March 2025, National Grid issued an updated version of the Historic Environment (HE) Viewpoints information.</p>	<p><u>NCC advised they were in agreement with this matter during a meeting held in January 2026.</u></p> <p>NCC position pending sight of the ES</p>	Agreed Und er discussion
EIA – Baseline Conditions				
3.6.68	Baseline conditions and receptors	<p>The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of Chapter 11 (Historic Environment) of the ES. The baseline conditions and receptors presented are considered appropriate.</p> <p>February 2025, National Grid issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment and held a meeting on the topic.</p>	<p><u>NCC advised they were in agreement with this matter during a meeting held in January 2026.</u></p> <p>NCC position pending sight of the ES</p>	Agreed Und er discussion
EIA – Embedded, Standard and Additional Mitigation Measures				
3.6.79	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Historic Environment effects, are set out in Section 11.6 of Chapter 11 (Historic Environment) of the ES. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p><u>NCC advised they were in agreement with this matter during a meeting held in January 2026.</u></p> <p>NCC position pending sight of the ES</p>	Agreed Und er discussion
3.6.84	Standard mitigation	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of Chapter 11 (Historic Environment) of the ES and set out in the Outline CoCP [document reference 7.2]. The standard</p>	<p><u>NCC advised they were in agreement with this matter during a meeting held in January 2026.</u></p> <p>NCC position pending sight of the ES</p>	Agreed Und er discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.		
3.6.94 4	Additional mitigation	The consideration of additional mitigation measures are presented in Section 11.6 of Chapter 11 (Historic Environment) of the ES. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. <u>The Applicant proposes to update 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] during the examination phase in consultation with the Local Planning Authority Archaeological Advisors, as discussed and agreed at regular monthly meetings with the Local Planning Authorities and Historic England.</u>	<u>The matter will remain NCC position Under discussion pending final agreement on sight of the archaeological surveys. ES</u>	Under discussion

EIA – Assessment Conclusions

3.6.10 42	Construction effects	The assessment of effects during construction is presented in Section 11.7 of Chapter 11 (Historic Environment) of the ES. The assessment of effects during construction presented is considered appropriate.	<u>NCC advised they were in agreement with this matter during a meeting held in January 2026. NCC position pending sight of the ES</u>	<u>Agreed Under discussion</u>
3.6.11 43	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 11.7 of Chapter 11 (Historic Environment) of the ES. The assessment of effects during operation (and maintenance) presented is considered appropriate.	<u>NCC does not think this is applicable for archaeology. NCC position pending sight of the ES.</u>	<u>Not applicable Under discussion</u>

Draft DCO / Outline Management Plans / Mitigation and Monitoring

3.6.12 44	Outline CoCP	The Outline CoCP includes all relevant construction mitigation measures specified in Chapter 11 (Historic Environment) of the ES and is appropriate for managing construction impacts from the Project.	<u>NCC advised they were in agreement with this matter during a meeting held in January 2026.</u>	<u>Agreed Under discussion</u>
--------------	--------------	---	---	--------------------------------

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>Meeting held in October 2024 to agree on the structure for the Outline CoCP.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP.</p> <p>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</p>	NCC position pending sight of the ES.	
Other matters as required				
3.6.13 45	Overarching Written Scheme of Investigation Investigations (WSIs) for pre-consent geophysical surveys and archaeological trial trenching.	<p>National Grid shared overarching WSIs in March – June 2024 and December 2024.</p> <p>The scope and methodology of the overarching WSI for pre-consent WSIs for geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required. impact anticipated.</p>	The scope and methodology of the overarching WSI for pre-consent geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.	Agreed
3.6.14 46	Site specific Written Schemes Scheme of Investigation Investigations (WSIs) for pre-consent geophysical surveys and archaeological trial trenching.	<p>The scope and methodology of WSIs for geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required. impact anticipated.</p> <p>There are still addenda to Further site specific WSIs forthcoming that have yet to will be issued in due course.</p>	The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.	Agreed Under discussion
3.6.15 47	Outline Archaeological Mitigation Strategy and Outline WSI.	The contents of the Outline Archaeological Draft Mitigation Strategy and Outline WSI (AMS-OWSI) is considered appropriate and proportionate to the level of evaluation required. impact anticipated.	This matter will remain Under discussion pending sight of an updated version of the document.	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>National Grid issued the Draft Outline AMS-OWSI for the post-consent stage of the project in April 2025. The Applicant proposes to update 7.5 Outline Archaeological Mitigation Strategy and draft Outline Written Scheme of Investigation [APP-328] during the examination phase in consultation with the Local Planning Authority Archaeological Advisors, as discussed and agreed at regular monthly meetings with the Local Planning Authorities and Historic England (WSI) for post-consent stage of the project in April 2025.</p>		
3.6.16	Programme for completion of archaeological fieldwork	<p>A summary of the progress to date and future programme for the archaeological evaluation fieldwork for the Project was presented in the technical note: 'Summary of Archaeological Fieldwork - Progress and Programme', issued on the 27 June 2025.</p> <p>A phased approach to archaeological evaluation is being undertaken. The Project has defined 'priority areas' on the basis of the likely scale of impact on archaeological remains, flexibility in design and construction programme. A proportion of the evaluation of 'priority areas' was completed at submission with the rest proposed to be completed pre examination. Evaluation of 'non priority areas' is proposed to be undertaken following completion of 'priority areas'.</p> <p>The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.</p>	<p>The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.</p>	Agreed
3.6.17	Supplementary Environmental Information	<p>NG sought agreement on the approach to Supplementary Environmental Information in the technical note: 'Summary of Archaeological Fieldwork - Progress and Programme', issued on the 27 June 2025.</p> <p>Given the comments provided it is understood that NCC are in agreement with the part of the note that sets out the</p>		Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		approach to supplementary information that will be provided for the DCO examination.		

3.7 Hydrology, Land Drainage and Flood Risk

Table 3.7 Matters Agreed, Not Agreed or Under Discussion in relation to Hydrology, Land Drainage and Flood Risk

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.7.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Hydrology, Land Drainage and Flood Risk assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) and Section 9.2 of Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	NCC position pending review of the ES	Under discussion
EIA – Approach and Methods				
3.7.2	Study area	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.7.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 12.4 of Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES.	NCC position pending review of the ES	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.7.4	Assessment methodology	The methodology for assessing Hydrology, Land Drainage and Flood Risk was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The methodology for assessing Hydrology, Land Drainage and Flood Risk was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.7.5	Key parameters and assumptions	Key parameters and assumptions associated with the Hydrology, Land Drainage and Flood Risk assessment are summarised in Section 12.4 of Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES. The key parameters and assumptions presented are considered appropriate.	NCC position pending review sight of the ES	Under discussion
EIA – Baseline Conditions				
3.7.6	Baseline conditions and receptors	The baseline conditions and receptors for Hydrology, Land Drainage and Flood Risk are presented in Section 12.5 of Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES. The baseline conditions and receptors presented are considered appropriate.	NCC position pending review sight of the ES	Under discussion
EIA – Embedded, Standard and Additional Mitigation Measures				
3.7.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Hydrology, Land Drainage and Flood Risk effects, are set out in Section 12.6 of Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC position pending review sight of the ES	Under discussion
3.7.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 12.6 of Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES and set out in the Outline CoCP [document reference 7.2]. The standard mitigation is considered appropriate and	NCC position pending review sight of the ES	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		adequate, in terms of its nature and scale, to address potential effects.		
3.7.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 12.6 of Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC position pending review of the ES	Under discussion
EIA – Assessment Conclusions				
3.7.10	Construction effects	The assessment of effects during construction is presented in Section 12.7 of Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES. The assessment of effects during construction presented is considered appropriate.	NCC position pending review of the ES	Under discussion
3.7.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 12.7 of Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES. The assessment of effects during operation (and maintenance) presented is considered appropriate.	NCC position pending review of the ES	Under discussion
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.7.12	Outline CoCP (including Flood Warning and Evacuation Plan)	<p>The Outline CoCP includes all relevant construction mitigation measures specified in Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held in October 2024 to agree on the structure for the Outline CoCP.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP.</p> <p>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</p> <p>Feedback received from NCC will be taken on board for the next iteration of the Outline CoCP.</p>	<p>The Outline Flood Warning and Evacuation Plan (FWEP) lacks clarity on:</p> <ul style="list-style-type: none"> Roles and responsibilities for signing up to warning services. Use of third-party properties as evacuation points without confirmed agreements. 	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
			<ul style="list-style-type: none"> • <u>Availability and accessibility of emergency plans on site.</u> • <u>Monitoring triggers and decision-making processes during flood events.</u> <p><u>NCC expects the plan to be aligned with Environment Agency and ADEPT guidance, with robust justification for any departures. NCC position pending sight of the ES</u></p>	
Other matters as required				
3.7.13	Flood Risk Assessment (FRA)	<p>The draft FRA was issued to stakeholders in January and March 2025.</p> <p>The scope, methodology, assessment and conclusions drawn in the FRA are considered appropriate and proportionate.</p> <p>Comments received from the LLFA will be taken on board for the next revision of this document.</p>	<p><u>Surface water flooding is inadequately considered (in contrast to fluvial and coastal risk) in the sequential test and the Flood Risk Assessment.</u></p> <p><u>The Environmental Statement and Flood Risk Assessment lack site-specific modelling, detailed drainage design annexes, and consistent application of stated methodologies.</u></p>	Under discussion

3.8 Landscape and Visual

Table 3.8 Matters Agreed, Not Agreed or Under Discussion in relation to Landscape and Visual

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.8.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Landscape and Visual assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) and Section 13.2 Chapter 13 (Landscape and Visual) of the ES.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	<p>NCC advised they were in agreement with this matter during a meeting held in January 2026. NCC position pending sight of the ES</p>	<p>Agreed Under discussion</p>
EIA – Approach and Methods				
3.8.2	Study area	<p>A meeting was held on the 25 September 2024 to seek to agree the study area and discuss where changes had been proposed. A further meeting was held on the 27th November to follow up on any additional changes to the study area.</p> <p>The study area for the LVIA was agreed in the meeting held on 27th November 2024.</p>	<p>The study area for the Landscape and Viewpoint Impact Assessment was agreed in the meeting held on 27th November 2024.</p>	Agreed
3.8.3	Data sources	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 13.4 of Chapter 13 (Landscape and Visual) of the ES.</p>	<p>NCC position pending sight of the ES</p>	Under discussion
3.8.4	Assessment methodology (including LVIA methodology and viewpoints)	<p>A meeting was held on the 25 September 2024 to seek to agree the detailed methodology. A further meeting was held on the 27th November to follow up on any additional changes to the study area.</p> <p>Assessment methodology for the Landscape and Viewpoint Impact Assessment was agreed in the meeting held on 27th November 2024.</p>	<p>Assessment methodology for the LVIA was agreed in the meeting held on 27th November 2024.</p>	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.8.5	Key parameters and assumptions	Key parameters and assumptions associated with the Landscape and Visual assessment are summarised in Section 13.4 of Chapter 13 (Landscape and Visual) of the ES. The key parameters and assumptions presented are considered appropriate.	NCC position pending review ^{sight} of the ES	Under discussion
EIA – Baseline Conditions				
3.8.6	Baseline conditions and receptors	The baseline conditions and receptors for Landscape and Visual are presented in Section 13.5 of Chapter 13 (Landscape and Visual) of the ES. The baseline conditions and receptors presented are considered appropriate. <u>National Grid note this position and will continue to engage with NCC on this matter.</u>	<u>NCC concludes that the LVIA baseline descriptions provided in the ES are broadly accurate, however some of the tranquillity of the Waveney Valley is understated in the ES narrative. During construction the effects are likely to be major adverse, and this cannot be overlooked in a landscape such as this.</u> NCC position pending sight of the ES	Under discussion
EIA – Embedded, Standard and Additional Mitigation Measures				
3.8.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Landscape and Visual effects, are set out in Section 13.6 of Chapter 13 (Landscape and Visual) of the ES. Embedded mitigation is considered appropriate and adequate , in terms of its nature and scale, to address potential effects.	<u>It is noted that the applicant has sought to embed mitigation into the design process where possible, this is key in avoiding environmentally sensitive landscape and visual features and avoiding or reducing significant effects that may be experienced</u>	<u>Agreed</u> Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.8.8	Standard mitigation	Standard mitigation measures to reduce potential Landscape and Visual effects during construction are summarised in Section 13.6 of Chapter 13 (Landscape and Visual) of the ES and set out in the Outline CoCP [document reference 7.2]. The standard mitigation is considered appropriate and adequate , in terms of its nature and scale, to address potential effects.	<p>during construction and operation of the proposals. NCC advised they were in agreement with this matter during a meeting held in January 2026. NCC position pending sight of the ES</p> <p>NCC advised they were in agreement with this matter during a meeting held in January 2026. NCC position pending sight of the ES</p>	Agreed Under discussion
3.8.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 13.6 of Chapter 13 (Landscape and Visual) of the ES. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><u>National Grid note this position and will continue to engage with NCC on this matter.</u></p>	<p><u>The applicant has not identified any additional mitigation measures beyond the embedded and standard measures as being required to further reduce significant environmental effects. Whilst we understand how this position has been reached, and the embedded and standard mitigation already proposed, there is potential for improvement which will result in minimising some of the impacts and effects.</u></p> <p><u>The mitigation strategy is generic in approach and does not account for the varied landscape of Norfolk.</u></p>	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
			<u>Our strong view is that the mitigation package should be more ambitious so that it can better address the significant adverse residual effects and aim for enhancement. NCC position pending sight of the ES</u>	
EIA – Assessment Conclusions				
3.8.10	Construction effects	The assessment of effects during construction is presented in Section 13.7 of Chapter 13 (Landscape and Visual) of the ES. The assessment of effects during construction presented is considered appropriate.	<u>NCC advised they were in agreement with this matter during a meeting held in January 2026. NCC position pending sight of the ES</u>	<u>Agreed</u> <u>Under discussion</u>
3.8.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 13.7 of Chapter 13 (Landscape and Visual) of the ES. The assessment of effects during operation (and maintenance) presented is considered appropriate.	<u>NCC position pending review</u> sight of the ES	Under discussion
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.8.12	Outline CoCP	The Outline CoCP includes all relevant construction related mitigation measures specified in Chapter 13 (Landscape and Visual) of the ES and is appropriate for managing construction impacts from the Project. Meeting held in October 2024 to agree on the structure for the Outline CoCP. Meeting held in March 2025 to discuss the second iteration of the Outline CoCP. A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.	<u>Matter still NCC position pending sight of the ES</u> <u>Under discussion</u> , <u>NCC would like further time to consider the oCoCP.</u>	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<u>National Grid will continue to engage with NCC on this matter.</u>		
3.8.13	Outline LEMP	The Outline LEMP includes all relevant operational related mitigation measures specified in Chapter 13 (Landscape and Visual) of the ES and is appropriate. Meetings held in October 2024 to agree on the structure for the Outline LEMP. Meeting held in March 2025 to discuss the second iteration of the Outline LEMP. A further iteration of the Outline LEMP was issued in May 2025 following the meeting and feedback in writing. <u>National Grid will continue to engage with NCC on this matter.</u>	<u>Matter still Under discussion. NCC would like further time to consider the oLEMP.</u>	Under discussion

Other matters as required

3.9 Socio-economics, Recreation and Tourism

Table 3.9 Matters Agreed, Not Agreed or Under Discussion in relation to Socio-economics, Recreation and Tourism

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.9.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Socio-economics, Recreation and Tourism assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) and Section 15.2 of Chapter 15 (Socio-economics, Recreation and Tourism) of the ES.	NCC position pending <u>review</u> of the ES	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.		
EIA – Approach and Methods				
3.9.2	Study area	<p>The Scoping Opinion stated: “The Applicant should seek to agree the study area with the relevant local authorities”.</p> <p>A meeting was held in November 2024 to seek to agree this point in the Scoping Opinion. Technical Notes were shared in June 2023 and April 2024.</p> <p>Following the meeting held in November 2024, it was agreed that the study area for businesses would be expanded from 1km to 3km to take into account potential visual effects on businesses.</p> <p>A 3rd Technical Note was issued in March 2025 to seek to agree the study area and methodology.</p>	Email dated 10 th October 2024 confirmed that NCC were in agreement on the scope and methodology regarding Socio-Economics, Recreation and Tourism as laid out in the Technical Note.	Agreed
3.9.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 15.4 of Chapter 15 (Socio-economics, Recreation and Tourism) of the ES.	<u>NCC advised they were in agreement with this matter during a meeting held in February 2026. NCC position pending sight of the ES</u>	Agreed Und er of discussion
3.9.4	Assessment methodology	<p>The Scoping Opinion stated “<i>The Applicant should seek to agree the study area with the relevant local authorities</i>” and “<i>The ES should detail the criteria used to identify businesses likely to be affected and the Applicant should seek to agree these with relevant local authorities</i>”.</p> <p>A meeting was held in November 2024 to seek to agree this point in the Scoping Opinion. Technical Notes were shared in June 2023 and April 2024.</p> <p>A 3rd Technical Note was issued in March 2025 to seek to agree the study area and methodology.</p>	Email dated 10 th October confirmed that NCC were in agreement with the scope and methodology regarding Socio-Economics, Recreation and Tourism as laid out in the Technical Note.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.9.5	Key parameters and assumptions	Key parameters and assumptions associated with the Socio-economics, Recreation and Tourism assessment are summarised in Section 15.4 of Chapter 15 (Socio-economics, Recreation and Tourism) of the ES. The key parameters and assumptions presented are considered appropriate.	NCC advised they were in agreement with this matter during a meeting held in February 2026. NCC position pending sight of the ES	Agreed Under discussion
EIA – Baseline Conditions				
3.9.6	Baseline conditions and receptors	The baseline conditions and receptors for Socio-economics, Recreation and Tourism are presented in Section 15.5 of Chapter 15 (Socio-economics, Recreation and Tourism) of the ES. The baseline conditions and receptors presented are considered appropriate.	NCC advised they were in agreement with this matter during a meeting held in February 2026. NCC position pending sight of the ES	Agreed Under discussion
EIA – Embedded, Standard and Additional Mitigation Measures				
3.9.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Socio-economics, Recreation and Tourism effects, are set out in Section 15.6 of Chapter 15 (Socio-economics, Recreation and Tourism) of the ES. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. <u>National Grid notes the additional information which is required and will continue to engage regarding this matter.</u>	This matter remains NCC position pending sight of the ES. Under discussion pending further information regarding airfields.	Under discussion
3.9.8	Standard mitigation	Standard mitigation measures to reduce potential Socio-economics, Recreation and Tourism effects during construction are summarised in Section 15.6 of Chapter 15 (Socio-economics, Recreation and Tourism) of the ES and set out in the Outline CoCP [document reference 7.2]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC position pending sight of the ES	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.9.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 15.6 of Chapter 15 (Socio-economics, Recreation and Tourism) of the ES. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><u>National Grid notes NCCs position and will continue to engage regarding this matter.</u></p>	<p><u>This matter remains NCC position pending sight of the ES Under discussion pending further information regarding employment and skills plan.</u></p>	Under discussion
EIA – Assessment Conclusions				
3.9.10	Construction effects	<p>The assessment of effects during construction is presented in Section 15.7 of Chapter 15 (Socio-economics, Recreation and Tourism) of the ES. The assessment of effects during construction presented is considered appropriate.</p>	<p><u>NCC advised they were in agreement with this matter during a meeting held in February 2026. NCC position pending sight of the ES</u></p>	Agreed Under discussion
3.9.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 15.7 of Chapter 15 (Socio-economics, Recreation and Tourism) of the ES. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p><u>National Grid notes the additional information which is required and will continue to engage regarding this matter</u></p>	<p><u>This matter remains NCC position pending sight of the ES Under discussion pending further information regarding airfields.</u></p>	Under discussion
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.9.12	Outline CoCP	<p>The Outline CoCP includes all relevant construction related mitigation measures specified in Chapter 15 (Socio-economics, Recreation and Tourism) of the ES, and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held in October 2024 to agree on the structure for the Outline CoCP.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP.</p>	<p><u>NCC advised they were in agreement with this matter during a meeting held in February 2026. NCC position pending sight of the ES</u></p>	Agreed Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.		

Other matters as required

3.9.13	<u>Employment and skills plan</u>	<p><u>Due to the nature of the Project, the potential maximum peak day construction workforce for local workers is anticipated to be approximately 172 Full Time Equivalents (FTEs) and the total job demand throughout the four-year construction period is anticipated to be approximately 480 jobs locally. This is considered to not be a significant number of construction employment when compared with other sectors. Given these considerations, a DCO requirement for a Skills and Employment Strategy would not be proportionate or necessary for the Project.</u></p> <p><u>However, the Applicant will work with local suppliers, facilitated by supporting forums (such as the local Chambers), on electricity industry skills and workforce planning. Post-construction job opportunities are limited given the nature of the development, however the Applicant will still work with Local Authorities (including facilitating local partners) to understand what is important to them around skills and employment to ensure we leave a lasting positive legacy in the communities where we operate. This will be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the DCO, as per the Community Funds for Transmission Infrastructure guidance.¹</u></p>	<p><u>NCC request a project-specific Employment and Skills Plan to be developed and included within the DCO process, ensuring Visibility of local skills needs and training opportunities; Collaboration with local authorities, colleges, and training providers; Commitments to apprenticeships, work placements, and supply chain engagement; and Monitoring and reporting mechanisms aligned with local economic development priorities.</u></p>	<u>Under discussion</u>
--------	-----------------------------------	---	--	-------------------------

¹ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure*.

3.10 Traffic and Transport

Table 3.10 Matters Agreed, Not Agreed or Under Discussion in relation to Traffic and Transport

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.10.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Traffic and Transport assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) and Section 16.2 of Chapter 16 (Traffic and Transport) of the ES [APP-271].</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
EIA – Approach and Methods				
3.10.2	Study area	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.3	Data sources	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 16.4 of Chapter 16 (Traffic and Transport) of the ES [APP-271].</p> <p><u>Updated Position January 2026:</u></p> <p><u>Within the Transport Assessment [APP-333] a review of the collision data for the latest available three-year period (2021-2023) was undertaken for all roads on the local highway network that form the Primary Access Routes between the Project Site Access Points and the Strategic Road Network (SRN). Where junctions connect to the SRN, a five-year period (2019-2023) was assessed. The collision data obtained online from DfT used within the assessment has been provided for your review. Through</u></p>	<p><u>Understood Position from Relevant Representation November 2025:</u></p> <p><u>"Accident data referred to in the ES appear to date from 2019 (i.e. pre-covid). Given the observed changes to working and travelling patterns since covid, NCC would request that more recent data is used."NCC confirmed agreement in their response to the first iteration of the SoCG.</u></p>	Agreed Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<u>further engagement a review of the latest available collision data is being undertaken to understand whether there are any changes to cluster sites at the junctions as well as along the PARs. National Grid will continue to engage with NCC on this matter.</u>		
3.10.4	Assessment methodology	<p>The methodology for assessing Traffic and Transport was outlined through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p> <p>Updated Position (January 2026):</p> <p><u>A standalone PRow chapter has not been included in the Environmental Statement (ES) as PRow related matters are far-reaching and impact multiple aspects of the Project. It was decided that PRow issues are better introduced and reviewed throughout the ES with the context of other topics, issues and proposals. National Grid will continue to engage with NCC on this matter.</u></p>	NCC requested that a separate PRow chapter should be provided in the ES. Refer to Section 3.11 PRow.	Under discussion
3.10.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with the Traffic and Transport assessment are summarised in Section 16.4 of Chapter 16 (Traffic and Transport) of the ES [APP-271]. The key parameters and assumptions presented are considered appropriate.</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
EIA – Baseline Conditions				
3.10.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Traffic and Transport are presented in Section 16.5 of Chapter 16 (Traffic and Transport) of the ES [APP-271]. The baseline conditions and receptors presented are considered appropriate.</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Embedded, Standard and Additional Mitigation Measures				
3.10.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Traffic and Transport effects, are set out in Section 16.6 of Chapter 16 (Traffic and Transport) of the ES [APP-271]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.8	Standard mitigation	Standard mitigation measures to reduce potential Traffic and Transport effects during construction are summarised in Section 16.6 of Chapter 16 (Traffic and Transport) of the ES [APP-271] and set out in the Outline CoCP [document reference 7.2] [APP-300]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 16.6 of Chapter 16 (Traffic and Transport) of the ES [APP-271]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
EIA – Assessment Conclusions				
3.10.10	Construction effects	The assessment of effects during construction is presented in Section 16.7 (Residual Effects) of Chapter 16 (Traffic and Transport) of the ES [APP-271]. The assessment of effects during construction presented is considered appropriate.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.10.11	Outline CoCP	The Outline CoCP [APP-300] includes all relevant construction related mitigation measures specified in Chapter 16 (Traffic and Transport) of the ES [APP-271] and is appropriate for managing construction impacts from the Project.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		Meeting held on 9 th October to agree on the structure for the Outline CoCP [APP-300] .		
Transport Assessment (TA) – Regulatory, Planning Policy Context and Guidance				
3.10.12	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Traffic and Transport assessment is presented in Chapter 3 of the TA [APP-333] . All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
Transport Assessment – Approach and Methods				
3.10.13	Study Area	The study area comprises all roads along the PARs, Wider road network (SRN/MRN) that might experience changes in traffic patterns resulting from the Project, PRoW and WCH routes that interact with the haul roads within the Order Limits and the PARs as presented within Section 2.216 (Transport Assessment Study Area) of the TA [APP-333] . The Study Area is considered appropriate for the assessment.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.14	Multimodal Strategy	A multi-modal assessment has been undertaken to examine opportunities to use rail and water-borne transport modes to supply materials for the construction of the Project and reduce movements on the wider highway network as presented within Appendix G (Section 6.2 (Construction Traffic Generation and Routeing – Multi-modal Transport ReportAssessment)) of the TA [APP-340] . The multi-modal assessment is considered appropriate and sufficiently covers the need to consider transport impacts, as set out within the Overarching National Policy Statement (NPS) for Energy EN-1 (2023).	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.15	Junction Capacity	Preliminary junction capacity assessments have been undertaken to establish whether there is a requirement to carry out a full assessment of the junctions with a traffic	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	Assessment Methodology	model as presented Section 6.93 (Construction Traffic Assessment Methodology - Road-only Transport Scenario) of the TA [APP-333]. This involved a preliminary assessment of the estimation of the volume to capacity (V/C) ratio that defines the performance threshold that classifies the operational status of each arm of the junction. 6.3.5 - If the junction V/C ratio is approaching capacity, at capacity or over capacity, a traffic model is required. The capacity assessment methodology used is considered appropriate.		
3.10.16	Junction Modelling	The methodology used for undertaking junction assessments is presented in Section 6.93 (Construction Traffic Assessment Methodology) (Road-only Transport Scenario) of the TA [APP-333]. The assessment methodology used is considered appropriate.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.17	Assessment of WCH	The assessment of WCH impacts as a result of the Project is presented in Section 7.4 (Walkers, Cyclists and Horse riders network) of the TA [APP-333]. This is based on the assessment undertaken within Section 16.7 (Residual Effects) of the ES [APP-271] and Appendix 16.4: Traffic and Transport Construction Effects of Chapter 16 - Traffic and Transport (document reference 6.16.A4) [APP-275]. The assessment methodology used is considered appropriate.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.18	Impact on Parking	The methodology for the assessment of impacts to on-street parking is presented within Section 6.5 (on Street Parking) of the TA [APP-333]. This includes a case-by-case assessment of temporary suspensions of formal and informal kerbside parking by the Project along PARs and Abnormal Load routes. This methodology is considered appropriate.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.10.19	Road Safety	<p>An assessment on Road Safety has been undertaken that thoroughly identifies the potential impact of the Project as set out in Section 4 (Existing Baseline Transport Conditions) of the TA [APP-333]. Collisions clusters have been identified along road links forming the PARs, based on existing baseline characteristics. A calculation of the accident rate per billion vehicle kilometres has been carried out on the road links forming the PARs to compare against the national statistics.</p> <p>Areas where potential road safety issues have been identified, as set out within Section 7 (Transport Assessment) of the TA [APP-333], will be highlighted within the Driver's pack as part of mitigation measures secured within the Outline CTMP (document reference 7.3) [APP-309]. The assessment methodology used is considered appropriate.</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
Transport Assessment – Mitigation Measures				
3.10.20	Mitigation Measures	<p>Mitigation measures include embedded, standard and additional mitigation identified within Section 2.2 (Project Description) of the TA [APP-333] and as reported within Section 16.6 of Chapter 16 (Traffic and Transport) of the ES [APP-271]. This includes the Outline CoCP (document reference 7.2) [APP-300], Outline CTMP (document reference 7.3) [APP-309] and additional mitigation at junctions and specific areas to help reduce the impact on capacity and provide environmental mitigation measures to reduce the significance of effects of the Project. The measures presented are considered appropriate.</p> <p><u>NCC comments are noted, and National Grid will continue to engage with NCC on this matter.</u></p>	NCC refers to comments raised on the draft CTMP shared in May 2025.	Under Discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
Transport Assessment – Baseline Conditions				
3.10.21	Policy and Legislation	The policy context, legislation and guidance considered when undertaking the Transport Assessment is presented in Chapter 3 (Key Planning Policy Context) of the TA [APP-333]. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.22	Baseline conditions	The baseline conditions and sensitive receptors for Traffic and Transport are presented in Section 4 (Existing Baseline Transport Conditions) of the TA [APP-333] and are considered appropriate.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
Transport Assessment – Future Baseline Conditions				
3.10.23	Growth Factors	The future baseline traffic on the SRN / MRN has been estimated applying appropriate growth factors derived from TEMPro NTEM dataset v7.2 and are presented in Chapter 5 (Future Baseline) of the TA [APP-333]. Growth factors have been applied for the peak year of activity and therefore vary along PARs. This approach and the growth rate used is considered appropriate.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.24	Cumulative Developments	The committed developments included within the cumulative assessment for the future baseline year are presented in Chapter 5 (Future Baseline) of the TA [APP-333]. These have been derived through a review of local authority planning portals, information received from LPAs and identifying those developments that overlap with the peak year activity for each PAR. The developments included within the assessment are considered appropriate.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
Transport Assessment – Trip Generation				
3.10.25	Key Assumptions	Key assumptions associated with the Traffic and Transport assessment are summarised in Section 16.4 of Chapter 16 (Traffic and Transport) of the ES [APP-271] and Section 6.72 of Chapter 6 of the TA [APP-333]. The key assumptions presented are considered appropriate.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.26	Methodology	The methodology for assessing the technical information received from the technical teams and generating the trip estimate is found within Section 6 (Methodology) of the TA [APP-333] is considered suitable and robust.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.27	Construction Vehicle Trips	Trip generation estimation has been undertaken to evaluate the daily traffic levels associated with construction activities for both the OHL and cables and substations. The estimation is based on a worst-case scenario, identifying peak-day vehicle movements for each construction activity to ensure a robust and conservative impact. This is presented in Section 6.32 (Construction vehicles overview) of the TA [APP-333]. The trip generation is considered appropriate.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.28	Construction Workforce Trips	Overhead Line, cabling and substation workforce trips have been estimated based on shared occupancy as presented in Section 6.43 (Construction Staff Overview) of the TA [APP-333]. An Outline Construction Workers Travel Plan (CWTP) [APP-311] has been prepared as part of the DCO application and is contained as an appendix within the Outline CTMP (document reference 7.3) [APP-309]. The Outline CWTP will be developed into a final detailed CWTP by the Main Works Contractor(s) following the submission of the DCO application. The workforce trip generation is considered appropriate.	NCC refers to comments raised on the draft CTMP shared in May 2025.	Under Discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<u>NCC comments are noted, and National Grid will continue to engage with NCC on this matter.</u>		
Transport Assessment – Conclusions				
3.10.29	Overall impact of the Project	The conclusions of the Transport Assessment are presented within Section 8 (Conclusion) of the TA [APP-333].- The conclusions are considered appropriate.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
Outline Construction Traffic Management Plan (CTMP)				
3.10.30	Project Team Roles and Responsibilities	The Project Teams Roles and Responsibilities are set out in Section 3 of the Outline CTMP [APP-309] .- These are considered to be clear and sufficient for the delivery of the Project. <u>Updated Position January 2026:</u> <u>NCC did not raise any comments related to Project Team Roles and Responsibilities (Section 3) in the draft CTMP (May 2025). The Outline Construction Traffic Management Plan [APP-309] was updated as part of the DCO submission in August 2025.</u>	No comments <u>NCC refers to comments raised on the draft CTMP shared in May 2025.</u>	Agreed <u>Under Discussion</u>
3.10.31	Pre-and Post Construction Surveys	Details of the proposed Pre and Post Construction surveys are set out in Section 5.2 of the Outline CTMP [APP-309] and connect to the mitigation measures detailed within the Outline Code of Construction Practice (oCOCP [APP-300]). <u>COCP).</u> These pre- and post-construction surveys are considered appropriate for the Project. <u>NCC comments are noted, and National Grid will continue to engage with NCC on this matter.</u>	NCC refers to comments raised on the draft CTMP shared in May 2025.	Under Discussion
3.10.32	Traffic Management Measures	Details of the proposed traffic management measures are set out in Section 5.8 of the Outline CTMP [APP-309] .- These traffic management measures are considered to be	<u>Understood Position from Relevant Representation November 2025:</u>	Agreed <u>Under Discussion</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>appropriate and adequate in terms of their nature and scale to address potential construction impacts.</p> <p>Updated Position January 2026: NCC did not raise any comments related to Traffic Management (Section 5.8) in the draft Outline CTMP (May 2025). The Outline Construction Traffic Management Plan [APP-309] was updated for the DCO submission in August 2025. Section 5.8 of the updated document details that the exact management, timings and locations of the proposed traffic management will be discussed and agreed with the Local Highway and Street Authorities. The Traffic Management will be secured through the use of Permit Schemes for each Local Highway Authority, where direct liaison is required.</p>	<p>"The promoter should liaise directly with stakeholders on traffic management and mitigation." NCC refers to comments raised on the draft CTMP shared in May 2025.</p>	
3.10.33	Implementation/ Enforcement	<p>The implementation and enforcement process set out in Section 6 of the Outline CTMP [APP-309] is considered to be appropriate and adequate for the Project.</p> <p>Updated Position January 2026: NCC did not raise any comments related to implementation and enforcement process set out in Section 6 of the draft Outline CTMP (May 2025). The Outline CTMP [APP-309] was updated for the DCO submission in August 2025.</p>	<p>No comments NCC refers to comments raised on the draft CTMP shared in May 2025.</p>	Agreed Under Discussion
Outline Construction Workers Travel Plan (CWTP)				
3.10.34	Policy	<p>The policy context, including legislation and guidance considered in the development of the document is set out in Section 4 of the Outline CWTP [APP-311] (Appendix B of the Outline CTMP). All relevant legislation, policy, and guidance have been identified and appropriately considered to inform the Outline CWTP.</p> <p>The Outline CWTP [APP-311] was updated for the DCO submission in August 2025. This matter is discussed in</p>	<p>NCC refers to comments raised on the draft CTMP shared in May 2025.</p>	Under Discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>Section 3 (Policy Review) of the Outline Construction Worker Travel Plan [APP-311]. NCC comments are noted, and National Grid will continue to engage with NCC on this matter.</p>		
3.10.35	Site Accessibility Review	<p>The Site Accessibility review is captured within Section 5 of the Outline CWTP [APP-311] (Appendix B of the Outline CTMP). This review is appropriate for the Project.</p> <p>The Outline CWTP [APP-311] was updated for the DCO submission in August 2025. This matter is discussed in Section 4 (Site Accessibility) of the CWTP [APP-311]. NCC comments are noted, and National Grid will continue to engage with NCC on this matter.</p>	<p>NCC refers to comments raised on the draft CTMP shared in May 2025.</p> <p>Updated Position February 2026: Under discussion – could a minibus be provided and parking off -site (P&R / Dunston Hall) be provided?</p>	Under Discussion
3.10.36	Targets, Strategy, and Measures	<p>Targets are set out within Section 6 of the Outline CWTP [APP-311] (Appendix B of the Outline CTMP). Strategy and Measures are set out within Section 8 of the CWTP [APP-311].</p> <p>The construction targets set out are considered to be relevant and achievable, given the present stage of Project development.</p> <p>The strategy and measures proposed to be implemented are suitable and appropriate for managing the anticipated construction staff travel impacts arising from the Project.</p> <p>The Outline CWTP [APP-311] was updated for the DCO submission in August 2025. This matter is discussed in Section 5 (Targets) and Section 7 (Travel Plan Strategy and Measures) of the Outline CWTP [APP-311]. NCC comments are noted, and National Grid will continue to engage with NCC on this matter.</p>	<p>NCC refers to comments raised on the draft CTMP shared in May 2025.</p>	Under Discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.10.37	Monitoring and Review	<p>The proposed monitoring and review process is set out in Section 9 of the Outline CWTP [APP-311] (Appendix B of the Outline CTMP). This is considered to be suitable and appropriate, given the present stage of Project development.</p> <p>Updated Position January 2026:</p> <p>NCC did not raise any comments related to Monitoring and Review (Section 9) of the draft Outline CWTP (May 2025). The CWTP was updated for the DCO submission in August 2025. This matter is discussed in Section 8 (Monitoring and Review) of the Outline Construction Worker Travel Plan [APP-311]. National Grid will continue to engage with NCC on this matter.</p>	<p>NCC refers to review comments raised on the updated Outline Construction Worker Travel Plan [APP-311] submitted draft CTMP shared in August May 2025.</p>	Under Discussion
Construction Access Strategy and Design				
3.10.38	Construction Access Approach	<p>The approach for construction access for the Project is proposed to utilise designated routes for construction traffic on local roads. These are defined as 'Primary Access Routes' (PARs) within Section 5 of the Outline CTMP [APP-309]. This approach is considered to be suitable for construction traffic for the Project.</p> <p>Updated Position January 2026:</p> <p>National Grid anticipates that access to the pylons throughout the construction will be via the Primary Access Routes, and the haul roads, following the routeing strategy detailed in the Outline CTMP [APP-309].</p> <p>The use of haul routes is the favourable solution for access as described in the General Construction Routeing Strategy (Section 5.4) of the Outline CTMP [APP-309]. This strategy reduces the number of site access points on the public highway network.</p>	<p>NCC refers to comments raised on the draft CTMP shared in May 2025.</p> <p>Understood Position from Relevant Representation November 2025:</p> <p>"We require clarification as to whether temporary access to pylons during construction will be directly from the highway network or via haul routes. We also require clarification as to whether maintenance access during the operational phase will be through existing field</p>	Under Discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>Maintenance access during the operational phase will be via existing field accesses. Access would typically be made on foot, by 4x4 or by tractor and trailer. Further details on operation and maintenance access can be found within the Application Document 6.4 Environmental Statement (ES) Chapter 4: Project Description (Section 4.10) [APP-130].</u></p> <p><u>NCC comments are noted, and National Grid will continue to engage with NCC on this matter.</u></p>	<p><u>accesses or whether new access points are required."</u></p> <p><u>"NCC prefers a construction access strategy which uses haul routes to minimise the number of individual accesses. Wherever possible, access should be from main roads which are suitable for the weight of construction traffic."</u></p>	
3.10.39	Primary Access Route Selection	<p><u>Routes on local roads proposed to be utilised as Primary Access Routes (PARs) are shown in the Indicative Highway Mitigation Plans within Appendix C of the Outline CTMP [APP-312 to APP-320 inclusive]. These have been discussed with NCC during regular engagement meetings since September 2023. These PARs are considered to be suitable for use by the proposed construction traffic, considering the proposed mitigation measures detailed within the Outline CTMP [APP-309].</u></p> <p>Updated Position (January 2026):</p> <p><u>Responses are provided below for each location raised:</u></p> <p>A140 Ipswich Road (Link PAR 1)</p> <p><u>Within the Environmental Statement (ES) Chapter 16 [APP-271] only the section of A140 Ipswich Road between the A147 road and Mangreen Lane needed to be assessed. The bridge over the railway is south of this location and therefore will not affect the sensitivity of Link PAR 1.</u></p> <p><u>National Grid notes the right-turn issues at A140 Ipswich Road and Mangreen Lane (Site 2). Within the Transport Assessment [APP-333] the results of the junction capacity assessments at Site 2 identified the need for mitigation in</u></p>	<p><u>Understood Position from Relevant Representation November 2025:</u></p> <p><u>NCC have highlighted several routeing constraints:</u></p> <p><u>The A140 Ipswich Road (Link PAR 128) has a weight-restricted railway bridge south of the access, which must be treated as a highway restraint. PAR 1 (A140 Ipswich Road) is part of the Major Road Network and therefore should be treated as a sensitive link.</u></p> <p><u>The Highway Authority is aware of existing right-turn issues at A140 Ipswich Road/Mangreen Lane (Site 2).</u></p>	Under Discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>the form of avoiding the AM peak hour due to the <u>insufficient right turn capacity to accommodate predicted future year increased queues. The proposed highway mitigation at this junction is limited to vegetation clearance to achieve visibility splays, as shown in the Indicative Highway Mitigation Plans within Appendix C of the Outline CTMP [APP-312 to APP-320 inclusive].</u></p> <p><u>B1134 Station Road / Long Row</u></p> <p><u>National Grid is coordinating with Network Rail to confirm the suitability of the level crossing on the B1134 Station Road for the HGV and Large Mobile Crane traffic required to deliver the Project. Network Rail have confirmed that the crossing is in good condition and agree in principle with its use during the project, provided that a topographical survey and a specific load model are provided by the Main Works Contractor in advance of any movements of AIL vehicles.</u></p> <p><u>A1066 at Diss (PAR 8)</u></p> <p><u>Discussions are ongoing, with the intention of agreeing a suitable distribution of construction traffic on the A1066 between routes via Thetford and Diss.</u></p>	<p>For PAR 7 (B1134 Station Road/Long Row), <u>confirmation is required from Network Rail that additional traffic is acceptable.</u></p> <p><u>Due refers to the sensitivity of the road link (referred to as PAR 829) HGV traffic should not travel via Disseomments raised on the A1066. Instead, traffic should be routed via PAR 9, which connects the same pylon construction areas to the A11. LGVs should also avoid the A1066 because RG56 will operate as a satellite compound. There is a recorded pedestrian collision on PAR 8 which highlights our concerns with using this route.</u></p> <p><u>draft CTMP shared in May 2025.</u></p>	
3.10.40	Construction Access and Crossover Design	<p>The proposed site access locations ('Access Bellmouths') and locations where construction traffic is proposed to cross the Public Highway ('Crossover Bellmouths') are set out in Schedule 9 – Access to Works of the Draft Development Consent Order [APP-056] and further shown in the Indicative Highway Mitigation Plans within Appendix C of the Outline CTMP [APP-312 to APP-320 inclusive]. CTMP. These locations are considered to be</p>	<p>NCC refers to comments raised on the draft CTMP shared in May 2025.</p>	Under Discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>suitable for use by the proposed construction traffic as part of the Project.</p> <p>The designs of the proposed accesses in these locations have been based on the Design Manual for Roads and Bridges CD123, and Stage 1 Road Safety Audits (RSAs) have been undertaken for each proposed location, overseen by NCC. These locations are considered to be suitable in principle, and remaining comments arising from the Stage 1 RSAs will be addressed in consultation with NCC as the Overseeing Authority.</p> <p><u>NCC comments are noted, and National Grid will continue to engage with NCC on this matter.</u></p>		
3.10.41	Highway Mitigation Design	<p>Mitigation measures proposed on the Public Highway are described in Section 5 of the Outline CTMP [APP-309], and are further set out in the following DCO Schedules [APP-056]:</p> <p>Schedule 6, Part 1 - Streets Subject to Permanent Alteration of Layout.</p> <p>Schedule 6, Part 2 - Streets Subject to Temporary Alteration of Layout.</p> <p>These are considered to be suitable and sufficient for the delivery of the Project.</p> <p>Where measures have been identified which may require works outside of the Public Highway (categorised as 'Red' mitigations under Section 5.98 of the Outline CTMP [APP-309]), specific designs have been developed for these locations. These designs were discussed with NCC during an engagement session in April 2025, and further to this, Stage 1 Road Safety Audits have been undertaken for each location, overseen by NCC. These locations are considered to be suitable in principle, and remaining comments arising</p>	<p>No comments NCC refers to comments raised on the draft CTMP shared in May 2025.</p>	<p>Agreed Under Discussion</p>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>from the Stage 1 RSAs will be addressed in consultation with NCC as the Overseeing Authority.</p> <p>Updated Position (January 2026): <u>NCC did not raise any comments related to Traffic Management (Section 5.8) in the draft CTMP (May 2025). The Outline CTMP [APP-309] was updated for the DCO submission in August 2025.</u></p>		
3.10.42	Traffic Management	<p>Traffic Management measures proposed on the Public Highway are described in Section 5 of the Outline CTMP [APP-309], and further set out in Schedule 5 - Streets Subject to Streetworks of the Draft Development Consent Order [APP-056]. These are considered to be suitable and sufficient for the delivery of the Project.</p> <p>Approaches to Traffic Management were discussed in principle during engagement session in June 2024, and further specific measures relating to highway mitigation design were discussed during an engagement session in April 2025.</p> <p>National Grid will continue to engage with NCC as the proposed Traffic Management measures are developed further, including through the Road Safety Audit process where these relate to proposed site access and crossover design (ID 3.10.40), and highway mitigation design (ID 3.10.41).</p> <p><u>NCC comments are noted, and National Grid will continue to engage with NCC on this matter.</u></p>	NCC refers to comments raised on the draft CTMP shared in May 2025.	Under Discussion
3.10.43	Traffic Regulation Orders and Temporary Traffic	<p>Proposed Traffic Regulation Orders (TROs) and Temporary Traffic Regulation Orders (TTROs) are shown in the Traffic Regulation Order Plans (document reference 2.4) [APP-025 to APP-032 inclusive], and set out in Schedule 13 of the draft DCO (document reference 3.1) [APP-056].</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	Regulation Orders	<ul style="list-style-type: none"> • Part 1 - Temporary Restriction of Waiting and Restriction of Speed. • Part 2 - Permanent Restriction of Waiting and Restriction of Speed. • Part 3 – Temporary Restriction of Access. • Part 4 – Temporary no Overtaking Order. <p>These are considered to be suitable and sufficient for the delivery of the Project.</p> <p>National Grid will continue to engage with NCC as the proposed TROs and TTROs are developed further, including through the Road Safety Audit process where these relate to proposed site access and crossover design (ID 3.10.40), and highway mitigation design (ID 3.10.41).</p>		
3.10.44	Proposed Construction Access on the A1066 via Diss and Thetford	<p>National Grid have engaged with NCC around access proposals on the A1066 between Diss and Thetford. Following initial concerns raised by NCC around the use of the A1066 through Diss as a Primary Access Route, a study was undertaken into potential access arrangements for this area, and the findings were shared with NCC in July 2024. Further engagement has taken place around the anticipated traffic impacts on these routes in April 2025. Discussions are ongoing, with the intention of agreeing a suitable distribution of construction traffic on the A1066 between routes via Thetford and Diss, based on the results of traffic modelling undertaken.</p> <p><u>NCC comments are noted, and National Grid will continue to engage with NCC on this matter.</u></p>	<p>Under discussion – pending further meeting to be held between NCC and NG.</p> <p><u>Understood Position from Relevant Representation November 2025:</u></p> <p><u>"Traffic counts at Sites 6-9 (Diss / A 1066 corridor) confirm NCC's concern with any routing via Diss during both AM and PM peaks. The LRN junction mitigation for Sites 6-10 has been discussed with NCC but is not accepted; with the flows in Tables 7.51, 7.54, 7.56, 7.58, 7.62, the evidence suggests adverse effects</u></p>	Under Discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.10.45	Proposed Traffic Regulation Order Closure of Wymondham Road	<p>National Grid have engaged with NCC around the proposed Primary Access Route (PAR) on Wymondham Road, west of Mulbarton. This route is shown as H01-A2 / H02-A1 on the Indicative Highway Mitigation Plans within Appendix C of the Outline CTMP [APP-313].</p> <p>For the section of this route on Wymondham Road south of the B1113, a temporary mitigation scheme has been developed to facilitate use of the road by construction traffic. This is detailed in Section 5.98 of the Outline CTMP [APP-309]. This includes a Traffic Regulation Order (TRO) proposed to close the impacted section for the duration of use by construction traffic – with public traffic to be diverted via the nearby Flordon Road – as set out in the Traffic Regulation Order Plans (document reference 2.4) [APP-025 to APP-032] and Schedule 13 of the draft DCO (document reference 3.1) [APP-056].</p> <p>It is considered that this arrangement is suitable, and appropriate for the proposed construction access usage.</p> <p>Updated Position (January 2026):</p>	<p>from any traffic using the A1066 via Diss."</p> <p>"In Table 5.9 of the outline CTMP, clarification is sought on Site 1 regarding whether congestion signs will be only on County roads or also on the A47 (Trunk Road); additionally, Sites 6–15 reference access via Diss, a route that has not been confirmed."</p> <p>Updated Position from SOCG Review February 2026:</p> <p>NCC is now satisfied with the proposed mitigation for right turning movements at the B1113/Wymondham Road junction.</p> <p>If any issues arise, these can be addressed as part of Section 5.9.10 of the CTMP. Under discussion – pending further meeting to be held between NCC and NG</p>	<p>Agreed Under Discussion</p>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>The results of the AM peak hour modelling assessment identified that the Project construction movements at the junction would have a marginal increase in the right turn queue length compared with the predicted future baseline with committed development flows. As such the speed limit reduction is considered appropriate mitigation for this junction anticipated short-term two-week peak activity.</p>		
Abnormal Indivisible Load (AIL) Access				
3.10.46	Abnormal Indivisible Load (AIL) Access Approach	<p>The approach for Abnormal Indivisible Load (AIL) access to the Project is to utilise designated routes on the local and Strategic Road networks. This approach is set out within Section 5 of the Outline CTMP [APP-309], and further detailed within the AIL Access Strategy [APP-310] (Appendix A of the Outline CTMP). A draft version of the AIL Access Strategy was shared with NCC in March 2025.</p> <p>This approach, in principle, is considered to be suitable for AIL access for the Project at the current stage of project development.</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.47	Abnormal Indivisible Load (AIL) Access Routes	<p>Routes proposed to be utilised by Abnormal Indivisible Loads (AILs) are shown in the AIL Access Strategy [APP-310] (Appendix A of the Outline CTMP).</p> <p>These have been developed following consultations with NCC. As part of these consultations, draft route information was shared in July 2024 and April 2025. National Grid will continue to engage with NCC as the proposed AIL access routes are developed further, including with respect to the ongoing structural investigations.</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.48	Abnormal Indivisible Load (AIL) Structural Investigations	<p>Routes proposed to be utilised by AILs are shown in the AIL Access Strategy [APP-310] (Appendix A of the Outline CTMP). National Grid have been consulting with NCC in relation to structures on the sections of the Local Road Network impacted by these proposed routes. As part of</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>these consultations, draft route information was shared in July 2024 and April 2025, and information around impacted structures requested. Specific concerns raised by NCC in relation to structures on the draft routes shared have been considered in the development of the proposals shown in the AIL Access Strategy [APP-310] (Appendix A of the Outline CTMP).</p> <p>Engagement with respect to impacted structures is anticipated to be ongoing in parallel with the Development Consent Order process. It is understood that any Approvals in Principle secured at the current stage of project development do not remove requirements for formal application ahead of any AIL movements undertaken by the Project. The relevant process is set out within Section 6 of the AIL Access Strategy [APP-310] (Appendix A of the Outline CTMP).</p> <p>This approach is considered to establish in principle that the proposed AIL deliveries required for the Project are feasible, and that a suitable process is being undertaken in order to facilitate the anticipated formal AIL movement applications anticipated during construction of the Project.</p> <p>The AIL applications submitted prior to vehicle movements made by the Main Works Contractor will address structures affected, street furniture and any third-party land impacts as well as programming and operational arrangements to accommodate the movements with minimal impact on the network.</p>		
3.10.49	Abnormal Indivisible Load (AIL) Mitigation and Management Measures	<p>The locations of proposed mitigation measures associated with proposed AIL Routes are shown in the Indicative Highway Mitigation Plans within Appendix C of the Outline CTMP [APP-312 to APP-320]. These mitigation measures have been developed consistently with the wider Highway Mitigation approach for the Project (ID 3.10.41),</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>and are considered to be suitable and sufficient for the delivery of the Project.</p> <p>Management measures relevant to AIL movements are discussed within Section 5.93 of the Outline CTMP [APP-309], and Section 6 of the AIL Access Strategy [APP-310] (Appendix A of the Outline CTMP). This approach, in principle, is considered to be suitable for AIL access for the Project at the current stage of project development.</p>		

3.11 Public Rights of Way (PRoW)

Table 3.11 Matters Agreed, Not Agreed or Under Discussion in relation to Public Rights of Way

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
PRoW Assessment Chapter				
3.11.1	PRoW Separate Chapter	<p>As per the Scoping Opinion received from the Planning Inspectorate, National Grid has not included a separate PRoW chapter in the Environmental Statement (ES).</p> <p>Preparing a separate PRoW chapter is not standard practice (there are no previous examples) and would contain a lot of repetition. Multiple effects on single PRoWs will be assessed within the cumulative ES chapter [APP-281]. This approach has been discussed with NCC at several meetings.</p> <p>Note that an Outline Public Rights of Way Management Plan [APP-329] (item ID 3.11.3) has been prepared to set out the proposed approach to the management of PRoWs during construction of the Project.</p> <p><u>Updated Position (January 2026):</u></p>	NCC requested that a separate PRoW chapter should be provided in the ES.	Under Discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>A standalone PRow chapter has not been included in the Environmental Statement (ES) as PRow related matters are far-reaching and impact multiple aspects of the Project. It was decided that PRow issues are better introduced and reviewed throughout the ES with the context of other topics, issues and proposals.</u></p>		
3.11.2	Types of PRow	<p>Types of PRow intended to be considered as part of the Management Strategy were shared with NCC within Section 2.1 of the PRow Methodology Statement document in April 2025. This list is considered to be suitable, and no additional PRow types are required to be captured. The PRow types intended to be considered are:</p> <ul style="list-style-type: none"> • Formally designated PRow (footways, bridleways, restricted byways, and byways open to all traffic) • Permissive paths • Open access land • Cycle tracks, including the National Cycle Network • Other routes with public access. <p>This is set out in Section 1.4 of the Outline PRow Management Plan.</p> <p>Updated Position (January 2026): <u>NCC comments received on 18/06/25 regarding the draft PRow Management Plan have been addressed and incorporated as appropriate into the Outline PRow Management Plan [APP-329] submitted as part of the DCO Application.</u></p>	<p>NCC refers to comments raised on the draft PRow Management Plan shared in May 2025.</p>	Under Discussion
3.11.3	Proposed Management Regime Approach	<p>The intended approach to management regimes to be considered as part of the Management Strategy were shared with NCC within Section 2.4 of the PRow Methodology Statement document in April 2025. This</p>	<p>NCC refers to comments raised on the draft PRow Management Plan shared in May 2025.</p>	Under Discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>established the following hierarchy of management measures:</p> <ul style="list-style-type: none"> • PRowS to be kept upon existing alignments as a first preference, utilising management measures if required. • Where maintaining existing PRow alignments is not practicable, diversions along the shortest suitable route will be proposed. • Where no suitable diversion routes are identified, PRow closures will be considered as a last resort. <p>This is set out in Section 3 of the Outline PRow Management Plan.</p> <p>Updated Position (February 2026): <u>NCC comments received on 18/06/25 regarding the Draft PRow Management Plan have been addressed and incorporated as appropriate into the Outline PRow Management Plan [APP-329] submitted as part of the DCO Application.</u></p>		
3.11.4	Routes with Public Access Affected by the Proposed Development	<p>Routes with public access affected by the proposed development are shown in the Access, Rights of Way and Public Rights of Navigation Plans [APP-033 to APP-040]. Details of proposed management measures for each impacted route are shown in Section 4 of the Outline PRow Management Plan [APP-329]. These are considered to be suitable, in line with the Proposed Management Regime Approach (ID 3.11.3) set out above.</p> <p>Updated Position (February 2026): <u>NCC comments received on 18/06/25 regarding the Draft PRow Management Plan have been addressed and incorporated as appropriate into the Outline PRow Management Plan [APP-329] submitted as part of the DCO Application.</u></p>	NCC refers to comments raised on the draft PRow Management Plan shared in May 2025.	Under Discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.11.5	Reinstatement Approach	<p>All PRoWs impacted by construction works will be reinstated to at least the same condition as prior to the works being undertaken. Pre- and Post-Condition Surveys will be undertaken in support of this, and any remediation works will be undertaken in consultation with NCC PRoW Officers as well as impacted landowner(s).</p> <p>This is set out in Section 3 of the Outline PRoW Management Plan [APP-329].</p> <p>Updated Position (February 2026): <u>NCC comments received on 18/06/25 regarding the Draft PRoW Management Plan have been addressed and incorporated as appropriate into the Outline PRoW Management Plan [APP-329] submitted as part of the DCO Application.</u></p>	NCC refers to comments raised on the draft PRoW Management Plan shared in May 2025.	Agreed Under of Discussion

3.12 Cumulative Effects

All matters relating to Cumulative Effects remain under discussion pending Norfolk County Council's review and assessment of the impacts of the project itself

Table 3.12 Matters Agreed, Not Agreed or Under Discussion in relation to Cumulative Effects

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.12.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Cumulative Effects assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) and Section 17.2 of Chapter 17 (Cumulative Effects) of the ES.	NCC position pending sight of the ES	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.		
EIA – Approach and Methods				
3.12.2	Study area	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.12.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 17.4 of Chapter 17 (Cumulative Effects) of the ES.	NCC position pending sight of the ES	Under discussion
3.12.4	Assessment methodology	The methodology for assessing Cumulative Effects was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The methodology for assessing Cumulative Effects was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.12.5	Key parameters and assumptions	Key parameters and assumptions associated with the Cumulative Effects assessment are summarised in Section 17.4 of Chapter 17 (Cumulative Effects) of the ES. The key parameters and assumptions presented are considered appropriate.	NCC position pending sight of the ES	Under discussion
EIA – Baseline Conditions				
3.12.6	Baseline conditions and receptors	The baseline conditions and receptors for Cumulative Effects are presented in Section 17.5 of Chapter 17 (Cumulative Effects) of the ES. The baseline conditions and receptors presented are considered appropriate.	NCC position pending sight of the ES	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Embedded, Standard and Additional Mitigation Measures				
3.12.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Cumulative Effects, are set out in Section 17.6 of Chapter 17 (Cumulative Effects) of the ES. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC position pending sight of the ES	Under discussion
3.12.8	Standard mitigation	Standard mitigation measures to reduce potential Cumulative Effects during construction are summarised in Section 17.6 of Chapter 17 (Cumulative Effects) of the ES and set out in the Outline CoCP [document reference 7.2]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC position pending sight of the ES	Under discussion
3.12.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 17.6 of Chapter 17 (Cumulative Effects) of the ES. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC position pending sight of the ES	Under discussion
EIA – Assessment Conclusions				
3.12.10	Construction effects	The assessment of effects during construction is presented in Section 17.7 of Chapter 17 (Cumulative Effects) of the ES. The assessment of effects during construction presented is considered appropriate.	NCC position pending sight of the ES	Under discussion
3.12.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 17.7 of Chapter 17 (Cumulative Effects) of the ES. The assessment of effects during operation (and maintenance) presented is considered appropriate.	NCC position pending sight of the ES	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.12.12	Outline CoCP	The Outline CoCP includes all relevant construction related mitigation measures specified in Chapter 17 (Cumulative Effects) of the ES and is appropriate for managing construction impacts from the Project. Meeting held in October 2024 to agree on the structure for the Outline CoCP. Meeting held in March 2025 to discuss the second iteration of the Outline CoCP. A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.		Under discussion

Other matters as required

3.13 Development Consent Order

Table 3.13 Matters Agreed, Not Agreed or Under Discussion in relation to Development Consent Order

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
<u>3.13.1</u>	<u>DCO Requirements</u>	<u>Requirement 7 (Construction Hours) of the draft DCO [APP-058] provides that the proposed core working hours are</u>	<u>12.2 NCC asks that construction activities are limited to 07:00 to 13:00 on Saturdays and no activities taking place on</u>	

- Inserted Cells
- Inserted Cells
- Inserted Cells
- Inserted Cells

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>07:00–19:00 Monday to Friday and 07:00–17:00 on Saturdays, Sundays, Bank Holidays and other Public Holidays, unless alternative hours are approved by the relevant planning authority. Certain activities such as percussive piling and HGV deliveries are limited to these core working hours, unless different hours are approved by the relevant authority. The construction works are largely linear and would not</u></p>	<p><u>Sundays and bank holidays, except for special operations agreed in advance with NCC as the local highway authority. 12.3 Construction working patterns have a direct impact on network peaks so it is important that start up and close down activities are included in the controlled construction working hours. 12.4 The range of activities listed in the outline Code of Construction Practice [APP-300] paragraph 2.2.6 (i.e. the</u></p>	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>occur along the entire length of the project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not</u></p>	<p><u>list of activities which may take place outside of core working hours) appears very broad, and its scope should be narrowed or clarified.</u></p>	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday.</u></p> <p><u>The defined core working hours provides essential flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and Bank Holidays. This flexibility is critical to maintaining programme resilience, allowing the</u></p>		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>project to respond to challenges that are often outside the control of the Applicant such as adverse weather, poor ground conditions, supply chain disruption, seasonal restrictions and access constraints. Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing</u></p>		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>consequential delay to the overall programme, and enable safe and efficient sequencing of works where extended stoppages would be impractical or disruptive. Where progress can be recovered through limited additional working rather than prolonging the programme, this can reduce overall construction duration and avoid extended impacts on communities, traffic networks, landholdings,</u></p>		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>and the environment.</u> <u>A blanket prohibition on Sunday and Bank Holiday working would remove this necessary flexibility, increasing the risk of programme slippage, inefficient stop-start working, and a longer overall construction period, which would itself result in greater long-term exposure to construction impacts than occasional controlled working on those days.</u> <u>Such a restriction</u></p>		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>would also undermine the deliverability of this critical national priority project, where timely delivery is in the public interest.</u></p> <p><u>Requirement 7 (5) of the draft DCO permits start up and close down to take place for an hour either side of the core working hours. It is anticipated that the HGVs associated with start up and close down activities will remain on site and will be delivered and removed during the core working hours. The staff movements associated with</u></p>		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>the activities will be travelling outside of the core working hours, as they are expected to be on site for 7am.</u></p> <p><u>The number of vehicle trips associated with the workforce have already been included within the assessment of traffic impacts, outside of the core working hours. The applicant anticipates that the majority of vehicles associated with start up and close down activities (with the exception of staff), will</u></p>		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>already be on site.</u> <u>Requirement 7(4) of the draft permits a limited range of activities to take place outside the core working hours where this is necessary to ensure public safety, engineering integrity, network reliability, or compliance with third-party requirements, and to minimise overall disruption. The activities identified are not routine construction works but are those that are time-critical,</u></p>		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>continuous once commenced, or externally constrained, such that restricting them to core hours would increase risk or prolong impacts. Works affecting highways, railways and watercourses, including conductor installation and the delivery of abnormal indivisible loads, are often governed by requirements of highway authorities, asset owners or the police, and are therefore routinely scheduled at</u></p>		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<u>nights or weekends to maintain safety and reduce disruption. Provision is also made for the continuation of works to a safe stopping point, the completion of works delayed by severe weather, emergency activities, security monitoring, and necessary survey works. Mechanical and electrical installation works undertaken within completed and enclosed buildings are expected to result in</u>		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>minimal external effects and can proceed outside core hours without significant effects on nearby receptors. The inclusion of activities that may take place outside core construction hours is not an indication that construction would routinely occur throughout the day and night. It is not typical construction practice for work to continue on an extended or overnight basis as standard. Core construction activity is</u></p>		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>expected to take place within the defined working hours in the normal course of construction.</u></p> <p><u>Importantly, any activities undertaken outside core construction hours remain subject to the controls and mitigation measures set out in the Outline Code of Construction Practice [APP-300] and Outline Construction Traffic Management Plan [APP-309]. These controls include provisions</u></p>		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>relating to noise management, lighting, environmental protection and monitoring, and construction traffic ensuring that any out-of-hours activity is appropriately managed and minimised. These measures will be secured via Requirement 4(1)(a) (Construction Management Plans) of the draft DCO within the final CoCP and CTMP.</u></p>		
3.13.24	DCO <u>Wording Requirements</u>	3.2 The Applicant has incorporated draft protective	Article 11 (street works) <u>3.2 Without a suitable</u>	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>provisions into the draft DCO and has sought engagement with relevant highway authorities on these provisions. The Applicant will continue to engage with the authority throughout the Examination process. 3.3 and 3.4 The principle of deemed discharge provisions in relation to the discharge of Requirements is not unique to this Project. The principle has precedent in the National Grid (Bramford to Twinstead Reinforcement)</u></p>	<p><u>highways side agreement in place (or agreed protective provisions), article 11(1) should be subject to the consent of the street authority. The same principle operates in relation to articles: 14(1) (power to alter layout, etc. of streets), 15(1) (permanent stopping up of streets and public rights of way), and 16(1)(a) (temporary closure of streets and public rights of way). Paragraphs (3) to (7) of article 11 may need consequential</u></p>	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>Order 2024. It is essential that a project of this scale and critical national importance incorporates these deemed approval provisions to ensure that matters outside of the Applicant's control do not unnecessarily frustrate the delivery of the Project.</u></p> <p><u>National Grid's position is that a 28 day decision making timeframe is proportionate and appropriate to each of the applications proposed to be made in this</u></p>	<p><u>edits to apply to consents granted under paragraph (1) as well as under paragraph (2).</u></p> <p><u>3.3 Paragraph (3) provides that consent is deemed to have been granted if the street authority does not notify the undertaker of its decision within 28 days. While NCC will do its best to deal with applications for consent as quickly as possible, 28 days is an unrealistically short timeframe in a context in which NCC is the street authority for a number of consented DCOs including</u></p>	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. A decision period of 56 days would</u></p> <p><u>In each instance, the draft DCO allows for the relevant decision-making authority and the undertaker to agree "such other period" as may be appropriate in</u></p>	<p><u>the Hornsea Three Offshore Wind Farm Order4, the Norfolk Boreas Offshore Wind Farm Order5, the A47/A11 Thickthorn Junction DCO6, the A47 Blofield to North Burlingham DCO7, the A47 North Tuddenham to Easton DCO8, the Norfolk Vanguard Offshore Wind Farm Order, and the Sheringham Shoal and Dudgeon Extensions Offshore Wind Farm Order. In addition to consented projects, there are also ten proposed NSIPs</u></p>	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>the circumstances.</u> <u>The Applicant acknowledges the authority's position. The words "not to be unreasonably withheld or delayed" are intended to account for instances where smaller or less contentious applications for consent have been submitted to the relevant authority to avoid unreasonable delays where decisions could reasonably be made within a shorter time period.</u></p>	<p><u>in Norfolk at various stages of project development for which NCC expects to be a street authority.</u> <u>3.4 NCC resists 'deemed consent' provisions in general but considers that if deemed consent provisions are to be included, 56 days would be a more appropriate time limit. For the same reasons, we also request that 28 days is replaced with 56 days in the following provisions: 14(5) (power to alter layout, etc. of streets); 16(8)</u></p>	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
			<p><u>(temporary closure of streets and public rights of way); 17(2) (access to works); 20(9) (discharge of water); 22(8) (authority to survey and investigate land), 49(10) (traffic regulation) and 50(5) (felling or lopping).</u></p> <p><u>3.5 If deemed consent provisions are included, then NCC considers the requirement for consent not to be 'unreasonably withheld or delayed' is redundant. Besides which, NCC is already prevented from making</u></p>	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
			decisions in an 'unreasonable' way by the ordinary principles of public law.	
3.13.3	DCO Wording – Closure of PRow	What might constitute a “reasonable time” will be specific to the particular facts in eaach instance, therefore, a definition or clarification of what this might be in the draft DCO would be impractical and potentially imprecise. Information regarding the time for which PRowS will be temporarily closed and diverted is contained within the	Article 16 (temporary closure of streets and public rights of way) 3.6 NCC considers that clarification is needed as to what might constitute a 'reasonable time' for the purpose of paragraph (1) of article 16, which enables the undertaker to 'temporarily close, alter or divert any street or public right of way shown on the access, rights of way	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>Outline PRow Management Plan [APP-329]. In summary, the strategy is to maintain access along PRowS at all times throughout the construction period, either through managing access along them on their existing alignment, or through provision of appropriate diversions. The approach proposed for each affected PRow, and the indicative timescales involved, are detailed in Section 8 of the Outline</u></p>	<p><u>and public rights of navigation plans or within the Order limits and may for any reasonable time—(a) divert the traffic from the street or public right of way; and (b) subject to paragraph (3), prevent all persons from passing along the street or public right of way.’ (emphasis added).</u></p> <p><u>3.7 Paragraph (5)(b) refers to the street authority’s ability to attach reasonable conditions to consents under article 16. For the avoidance of doubt, NCC considers that other provisions</u></p>	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>PRoW Management Plan [APP-329] and have been kept as short as possible within the constraints of the works being carried out that will affect them.</u></p> <p><u>National Grid's Main Works Contractor will further develop the construction programme during detailed design, and refined durations and closure dates will be communicated to Norfolk County Council as part of ongoing engagement.</u></p> <p><u>The Applicant considers that</u></p>	<p><u>which provide for consents should also explicitly state that reasonable conditions may be applied (notwithstanding the earlier point that NCC may not lawfully behave unreasonably in any case).</u></p> <p><u>3.8 In addition, the Council considers that article 16 should provide that any temporary diversion specified in column (4) of Part 1 or Part 3 of Schedule 8 must be open for use, and in the case of a street, must be completed to the reasonable satisfaction of the street</u></p>	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>the safeguards sought by Norfolk County Council in relation to both highway and PRow diversions are already secured through the draft DCO and its relevant management plans.</u></p> <p><u>Under Requirement 4 of the draft DCO, the final PRow Management Plan and Construction Traffic Management Plan must be submitted to, and approved by, the relevant Local Highway Authority before works commence on</u></p>	<p><u>authority, before the corresponding street or public right of way in temporarily stopped up, altered or diverted.</u></p>	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>any stage of the project.</u> <u>This approval process will include agreement of the details, sequencing and suitability of any temporary diversions affecting streets or PRowS.</u> <u>For highways, the Outline Construction Traffic Management Plan [App-309] commits to coordinating all temporary traffic management with the relevant Local Highway Authorities through the use of the applicable</u></p>		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>Permit Schemes and/or Traffic Regulation Order or Temporary Traffic Regulation Order processes. These processes require diversion routes to be identified, appropriate and agreed with the highway authority in advance, thereby ensuring that suitable diversion arrangements are secured prior to any closure taking effect. For PRowS, the Outline</u></p>		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>PRoW Management Plan [APP-329] commits to advance notification to the LHA PRoW Officer for all temporary closures, identification of diversion routes where required, and provision of appropriate signage and management measures. These provisions ensure that diversion arrangements must be agreed and ready to implement before any closure is enacted. The Outline PRoW Management</p>		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>Plan [APP-329] also commits to reinstatement being completed to the reasonable satisfaction of the LHA PRow Officer.</u></p> <p><u>The inclusion in paragraph 5(b) of Article 16 of an express ability to attach conditions to a consent is because the streets or PRowS referred to in that paragraph are not already identified in Schedule 8, hence the ability to attach conditions allows the relevant authority to bring any consents to</u></p>		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>these streets or PRow's in line with the details for those agreed under the approvals processes referred to above.</u></p> <p><u>Taken together, the requirement for the relevant street authority's approval of the final Plans, the statutory procedures governing highway closures, and the commitments within the outline Plans ensure that no PRow or highway is temporarily stopped up, altered or</u></p>		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>diverted until suitable diversion arrangements have been agreed and can be made available. The Applicant therefore considers that Article 16 already provides adequate control and that no amendment is necessary.</u></p>		
<p><u>3.13.4</u></p>	<p><u>DCO – Requirements - timescales</u></p>	<p><u>National Grid's position is that a 28 day decision making timeframe is proportionate and appropriate to each of the applications proposed to be made in this</u></p>	<p><u>Schedule 4 (discharge of requirements) 3.9 The timescales in schedule 4 are too short and should be changed so that they are at least no shorter than those set out in PINS' Advice</u></p>	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. In each instance, the draft DCO allows for the relevant decision-making authority and the undertaker to agree "such other period" as may be appropriate in the circumstances. Likewise, there</u></p>	<p><u>Note Fifteen: drafting Development Consent Orders¹¹, which is 42 days or, preferably, 56 days accounting for the unusually high volume of NSIPs being handled in Norfolk. 3.10 NCC finds the justification for shorter timescales given in the draft Explanatory Memorandum (that 'shorter time limits are necessary and proportionate in light of the immediate and pressing national need which the</u></p>	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>is scope within paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) [APP-056] to extend the 28 day period for the discharge of Requirements by agreement in writing between the undertaker and the relevant authority.</u></p> <p><u>The Applicant notes the authority's comment that longer periods are well preceded for on other projects which also meet an urgent need as defined by NPS EN-1, however, the Project is</u></p>	<p><u>Project is intended to address'12) to be unconvincing given that longer periods are well preceded for other projects which also meet an urgent need as defined by NPS EN-1.</u></p>	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>vastly different in nature and scale to many other of these projects, passing through 13 host local authorities.</u></p>		
<p><u>3.13.5</u></p>	<p><u>DCO Requirements – protective provisions</u></p>	<p><u>The Applicant will continue to engage with relevant stakeholders on matters including the draft protective provisions.</u></p>	<p><u>Schedule 16 (protective provisions) 3.11 NCC notes the inclusion of protective provisions for the protection of drainage and flood authorities (in part 3) and for the protection of the highway authorities (in part 4). Neither set of protective provisions have been agreed with NCC. 3.12 In the case of the flood authority</u></p>	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
			<p><u>provisions, negotiations have been ongoing with the developer since August this year. In relation to the highway authority provisions, NCC would strongly prefer for all local highway authorities to agree a framework highways agreement with the applicant which allows for more detailed agreements to be made in relation to specific works.</u></p>	
Other matters as required				

3.14 Other Matters

4. Confirmation of Agreement

The above SoCG is agreed between National Grid and Norfolk County Council on the date specified below.

Signed for and on behalf of National Grid:

.....

Date:

.....

Signed for and on behalf of Norfolk County Council:

.....

Date:

.....

Abbreviations

Abbreviation	Full Reference
AIL	Abnormal Indivisible Loads
AIS	Air Insulated Switchgear
AOD	Above Ordnance Datum
AONB	Area of Outstanding Natural Beauty
BNG	Biodiversity Net Gain
CoCP	Code of Construction Practice
CSE	Cable Sealing End
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
EACN	East Anglia Connection Node
EHO	Environmental Health Officer
EIA	Environmental Impact Assessment
ES	Environmental Statement
GI	Ground Investigation
GW	Gigawatt
LLFA	Lead Local Flood Authority
LVIA	Landscape and Visual Impact Assessment
NCC	Norfolk County Council
NCR	National Cycle Route
NETS	National Electricity Transmission System
NPSs	National Policy Statements
PEIR	Preliminary Environmental Information Report
PRoW	Public Right of Way
SoCG	Statement of Common Ground
SoCC	Statement of Community Consultation
SPZ	Source Protection Zone
WFD	Water Framework Directive
WSI	Written Scheme of Investigation
ZoI	Zone of Influence
ZTV	Zone of Theoretical Visibility

National Grid plc
National Grid House,
Warwick Technology Park,
Gallows Hill, Warwick.
CV34 6DA United Kingdom

Registered in England and Wales
No. 4031152
nationalgrid.com