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Norwich to Tilbury

Volume 5: Reports and Statements

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County Council (SCC) (incl LLFA and Highways) - Tracked Changes
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DRAFT

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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 Suffolk County Council (SCC). 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 SCC. The applicable matters considered within this SoCG apply to SCC'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 phase of the DCO process, ahead of submission. It is intended to be a live and working document which will be updated as the Project progresses and shared with Suffolk County Council 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.~~

~~4.31.2~~ Project Description

~~4.3.1.2.1~~ 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.

4.3.21.2.2 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).

4.3.31.2.3 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.

4.3.41.2.4 The Project ~~will~~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.

4.41.3 Format and Structure of this Document

4.4.41.3.1 This SoCG is structured as follows:

- **Section 2** provides a summary of the key engagement undertaken to date with SCC
- **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 Introduction

2.1.1 National Grid has engaged with SCC 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 [Table 2.1](#) provides an overview of the key engagement that has taken place between National Grid and SCC.

Table 2.1 Summary of Key Engagement between National Grid and SCC

Date	Format	Topic/Description
General		
May 2022 – Ongoing	Meeting	Monthly informal catch-up calls.
September 2022	Meeting	All host authority workshop.
October 2022	Site visit	T-pylon site visit with case officers.
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.
February 2024	Meeting	Connection agreement discussion.
March 2024	Meeting	All host authority workshop.
March 2024	Email Correspondence	National Grid issued the SoCC to all host authorities for statutory consultation.
April 2024	Meeting	DCO discussion with SCC and Babergh and Mid Suffolk District Council's (BMSDC).
May 2024	Meeting	All host authority workshop.
June 2024	Meeting	DCO discussion with SCC and BMSDC.
September 2024	Email Correspondence	National Grid issued the draft Outline Code of Construction Practice (CoCPOCoCP) 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.
January 2025	Email Correspondence	National Grid issued the second iteration of the Outline Code of Construction Practice (CoCPOCoCP)
November 2024	Meeting	Meeting to discuss approach to targeted consultation
November 2024	Meeting	All host authority workshop
January 2025	Meeting	Meeting to provide project and design update

Date	Format	Topic/Description
January 2025	Meeting	All host authority workshop
January 2025	Meeting	National Grid hosted a meeting to discuss comments on the second iteration of the Outline LEMP and Outline CoCP
January 2025	Email Correspondence	National Grid issued the draft Statement of Common Ground (SoCG)
March 2025	Meeting	All host authority workshop
May 2025	Email Correspondence	National Grid shared an updated Outline CoCP Code of Construction Plan (OCoCP)
May 2025	Email Correspondence	National Grid issued a new appendix to the draft Outline CoCP Code of Construction Practice (eCoCP) - Appendix H, Draft Greenhouse Gas Reduction Strategy
May 2025	Email Correspondence	National Grid issued the Long List of Other Developments
May 2025	Meeting	Meeting to discuss duty to further the purposes of the National Landscape
May 2025	Meeting	All host authority workshop
May 2025	Technical Note	National Grid shared 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	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

Date	Format	Topic/Description
		Biodiversity Assessment Methodology and Arboriculture Assessment Methodology and sought feedback from SCC and other authorities.
September 2023	Meeting	National Grid discussed the potential off-site scheme/initiatives for BNG.
September 2023	Email Correspondence	National Grid shared the draft Order Limits shapefile with SCC.
October 2023	Email Correspondence	National Grid shared the shapefiles of the corridor dated 06/07/23.
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.
September 2024	Email Correspondence	National Grid shared the Outline LEMP 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 Outline CoCP.
January 2025	Email Correspondence	National Grid shared the second iteration of the Outline LEMP Landscape and Ecological Management plan (OLEMP)
January 2025	Email Correspondence	National Grid issued the Biodiversity Net Gain Assessment Strategy
January 2025	Email Correspondence	National Grid issued a technical note to all host authorities on Proposed Protected Species Mitigation Measures
January 2025	Meeting	National Grid hosted a meeting to discuss comments from stakeholders on proposed mitigation for species outside the remit of Natural England
January 2025	Meeting	National Grid hosted a meeting to discuss comments from stakeholders on the draft Biodiversity Net Gain Report
April 2025	Email Correspondence	National Grid issued the draft Arboricultural Impact Assessment (AIA)

Date	Format	Topic/Description
April 2025	Meeting	National Grid hosted a meeting to discuss comments from stakeholders on the second iteration of the proposed mitigation for species outside the remit of Natural England.
May 2025	Email Correspondence	National Grid shared an updated Outline LEMP
May 2025	Email Correspondence	National Grid shared a new appendix to the updated Outline Landscape and Ecological Management Plan (oLEMP) – Appendix D, Outline Landscape Proposals
May 2025	Meeting	National Grid hosted a meeting to discuss the updated Proposed Protected Species Mitigation.
September 2025	Meeting	Optional thematic group meeting to discuss feedback on the ecology section of the Environmental Statement
January 2026	Meeting	National Grid hosted a meeting with Essex Place Services 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.
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 Air Quality assessment for review and comment.
September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Noise and Vibration 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.

Date	Format	Topic/Description
September 2023	Email Correspondence	SCC requested that mental health during the Project's operation is considered within the Health and Wellbeing assessment.
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.
December 2024	Meeting	National Grid held an additional meeting for those unable to attend the September meeting to discuss and agree the proposed assessment scope and methodology for the Health and Wellbeing chapter of the ES.
<u>October 2025</u>	<u>Meeting</u>	<u>Optional thematic group meeting to discuss feedback on the health and wellbeing section of the Environmental Statement</u>

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.
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 (including Suffolk County Council) to agree methodology for the

Date	Format	Topic/Description
		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 ZTV) for feedback from all host authorities, Natural England and Historic England.
March 2024	Email Correspondence	National Grid responded to cultural heritage viewpoint feedback from stakeholders.
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.
March 2024	Email Correspondence	National Grid responded to feedback received on viewpoints.
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.

Date	Format	Topic/Description
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.
June 2024	Technical Note	National Grid shared the Site Specific WSI for the EACN (Site 001) with the Archaeology Working Group Members (including Suffolk County Council) for information.
June 2024	Meeting	Archaeology Working Group Meeting.
August 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.
October 2024	Email Correspondence	National Grid shared Site Specific WSI for Trial Trenching, Site 008, 'Underground Cable between Coopers Corner and River Stour'
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	Meeting	Archaeology Working Group Meeting
February 2025	Email Correspondence	National Grid issued Historic Environment (HE) Viewpoints information
February 2025	Email Correspondence	National Grid issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment
February 2025	Meeting	Historic Environment Thematic Group Meeting regarding Historic Environment Viewpoints
February 2025	Meeting	National Grid held a meeting to discuss the Heritage Baseline Report
March 2025	Email Correspondence	National Grid issued updated Historic Environment Viewpoints information
March 2025	Meeting	Archaeology Working Group Meeting
April 2025	Meeting	Archaeology Working Group Meeting

Date	Format	Topic/Description
April 2025	Email Correspondence	National Grid issues the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project
May 2025	Meeting	Archaeology Working Group Meeting
June 2025	Meeting	National Grid shared the Archaeological Fieldwork Summary.
June 2025	Meeting	Archaeology Working Group Meeting
June 2025	Technical Note	National Grid shared additional trench plans for Site 008, Area 22, north of the River Stour.
July 2025	Meeting	Archaeology Working Group Meeting
July 2025	Technical Note	National Grid shared the combined SSWSI for Sites 005, 006 and 007 and associated trench plans.
August 2025	Meeting	Archaeology Working Group Meeting
September 2025	Meeting	Archaeology Working Group Meeting
September 2025	Technical note	National Grid shared Priority Geophys Prelim Grayscales 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
October 2025	Meeting	A second follow up optional thematic group meeting to discuss feedback on the heritage section of the Environmental Statement
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	Meeting	Archaeology Working Group Meeting
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 with Essex Place Services.
January 2026	Meeting	Meeting to discuss the heritage aspects of the Statement of Common Ground
January 2026	Meeting	Follow up meeting to discuss the heritage aspects of the Statement of Common Ground

Date	Format	Topic/Description
		with Essex Place Services and Babergh and Mid Suffolk District Council.
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.
May 2023	Technical Note	National Grid issued a technical note for comment, which set out the approach to preparing the Flood Risk Assessment (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 hosted a meeting to discuss comments received on the Draft Flood Risk Assessment (FRA)
March 2025	Email Correspondence	National Grid issued the Draft Flood Risk Assessment (FRA) for agreement/comment

Date	Format	Topic/Description
September 2025	Meeting	Optional thematic group meeting to discuss feedback on the hydrology and land drainage section of the Environmental Statement
November 2025	Meeting	Meeting to discuss the Hydrology and Drainage Section of the Statement of Common Ground.
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 Suffolk. National Grid sought agreement on the viewpoint locations to include in the Preliminary Environmental Information Report (PEIR) and the ES. Suffolk County Council provided feedback on the viewpoints at the meeting and in subsequent correspondence.
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 February meeting. Stakeholders (including SCC) 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 Zone of Theoretical Visibility (ZTV) mapping for comment.

Date	Format	Topic/Description
January 2024	Email Correspondence	National Grid shared the updated landscape viewpoints (and the ZTV) and sought feedback from all host authorities.
March 2024	Meeting	National Grid responded to feedback received on viewpoints.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
July 2024	Meeting	National Grid held an optional briefing regarding statutory consultation for those from Suffolk County Council and Essex Place Services who could not join the Optional Statutory Consultation Thematic Group call in May 2024.
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 SCC 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.
September 2024	Meeting	Landscape Thematic Group Meeting to discuss viewpoints – Suffolk.
October 2024	Meeting	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 viewpoint information data following from the landscape thematic workshops

Date	Format	Topic/Description
November 2024	Meeting	National Grid meeting to agree LVIA methodology and viewpoint photography locations and photomontages to be used for the ES
March 2025	Email Correspondence	National Grid issued an update on LVIA Viewpoints and Methodology
October 2025	Meeting	National Grid hosted an optional thematic meeting on landscape compensation, adequacy of LVIA, landscape assessment sensitivity and landscape character types.
October 2025	Meeting	A second optional thematic group meeting to discuss feedback on the landscape section of the Environmental Statement.
January 2026	Meeting	Meeting to discuss the Landscape and Visual Section 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. This meeting was attended by several stakeholders, including SCC.
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 Public Right of Way (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,

Date	Format	Topic/Description
		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	Technical Note	National Grid issued the third Technical Note for Socio-economics, Recreation and Tourism
<u>September 2025</u>	<u>Meeting</u>	<u>National Grid held an optional thematic group meeting to discuss the level of impact on businesses and lack of upskilling for local people.</u>

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 stakeholder meeting with SCC setting out details of the proposed alignment, haul roads, PARS, MRN and SRNs affected and proposed construction vehicles including for Bramford substation and cable sealing compounds.
September 2023	Meeting	National Grid held a Transport Working Group Regional Meeting.

Date	Format	Topic/Description
November 2023	Meeting	National Grid held a Transport Working Group meeting with the Local Highways Authorities (including SCC).
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) at the Transport Working Group.
March 2024	Technical Note	PAR routes sent to LHAs
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 Suffolk County Council).
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.
July 2024	Report	Receipt by National Grid of statutory consultation response from SCC.
July 2024	Email Correspondence	Proposed Abnormal Indivisible Load (AIL) Routes issued for comment.
July 2024	Meeting	National Grid held a Transport Working Group Meeting with SCC to discuss statutory consultation comments and PAR highway mitigation including merge taper on the A12 within National Highways jurisdiction.
August 2024	Meeting	National Grid held a Transport Working Group Regional Meeting with all LHAs present. Highway mitigation including TTROs and TROs to be presented in schedules, PRow surveys to be arranged by PRow officers and RSAs for crossover bellmouths to be sent to LHAs for review.

Date	Format	Topic/Description
September 2024	Meeting	National Grid held a Transport Working Group Regional Meeting. General structure and content of 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 Regional Meeting with all LHAs present. Updated AIL route packs sent out, re-cap of multi modal study given.
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 AILs.
January 2025	Meeting	National Grid held a Transport Working Group Meeting. Presented work in progress draft of Transport Assessment. Ran through methodology of junction sifting process, junction assessment methodology and cumulative assessment.
January 2025	Meeting	National Grid presented examples of the likely environmental mitigation measures for junctions and Primary Access Routes predominately where WCH Amenity raised.
January 2025	Meeting	National Grid held a Suffolk Traffic and Transport Working Group meeting. UK Power NetworksUKPN accesses and need for additional RSAs discussed, highway mitigation developments made, PRow mitigation strategy to be shared, IEMA mitigation, SOCGs and transport assessment discussed.
February 2025	Email Correspondence	National Grid issued the Draft Transport Assessment and Figures
February 2025	Email Correspondence	National Grid issued the Mitigation and Junction RAG Strategy
February 2025	Meeting	National Grid Traffic and Transport Working Group Regional Meeting, all LHAs present. TTROs and PRow closures to be captured in schedules, updates on trip generation give, various meetings to be arranged including for AILS, TROs and TTROs, and ES and TA.
March 2025	Meeting	National Grid presented examples of the likely environmental mitigation measures for junctions

Date	Format	Topic/Description
		and Primary Access Routes predominately where WCH Amenity raised.
April 2025	Meeting	National Grid held a SCC Highway Mitigation Workshop. Highway mitigation proposals at 5no. locations were discussed. RSA briefs sent in February to be reviewed by SCC.
April 2025	Meeting	National Grid held a Regional Stakeholder Meeting with SCC. AIL process, routes and agreement on approach sought ahead of DCO.
April 2025	Meeting	National Grid attended a meeting with Suffolk County Council on priority-controlled junctions and traffic modelling. Discussed the results from LRN junction modelling and potential mitigation measures.
May 2025	Meeting	National Grid held a meeting to discuss the LRN junction modelling results in Suffolk for Norwich to Tilbury.
May 2025	Meeting	National Grid held a Regional Stakeholder Meeting with SCC. 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 Suffolk County Council present. Progress with Road Safety Audits, Statements of Common Ground, and Traffic Modelling were discussed.
July 2025	Meeting	National Grid held a Local Highway Authority Thematic Group Meeting with Suffolk County Council.
August 2025	Meeting	National Grid held a Regional Stakeholder Meeting with Suffolk County Council present. Progress with Road Safety Audits, Statements of Common Ground, and Traffic Modelling were discussed.
September 2025	Meeting	National Grid held a Local Highway Authority Thematic Group Meeting with Suffolk County Council.
October 2025	Meeting	National Grid held a Regional Stakeholder Meeting with Suffolk County Council present. Progress with Road Safety Audits, Statements of Common Ground, and Traffic Modelling were discussed.

Date	Format	Topic/Description
<u>November 2025</u>	<u>Meeting</u>	<u>Optional thematic group meeting to discuss feedback on the traffic, transport and PrOW section of the Environmental Statement</u>
<u>November 2025</u>	<u>Meeting</u>	<u>National Grid held a Local Highway Authority Thematic Group Meeting with Suffolk County Council.</u>
<u>November 2025</u>	<u>Email Correspondence</u>	<u>Comments updating Suffolk County Council's position on the Statement of Common Ground were provided by SCC.</u>
<u>January 2026</u>	<u>Meeting</u>	<u>National Grid held a meeting with Suffolk County Council to discuss further discuss Statements of Common Ground matters and updated positions from both parties.</u>
<u>February 2026</u>	<u>Email Correspondence</u>	<u>Final comments on the Statement of Common Ground before Deadline 1 were provided by Suffolk County Council.</u>

3. Matters Agreed, Not Agreed or Under Discussion

3.1 Overview

- 3.1.1 This chapter details the matters relevant to SCC 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 SCC. 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 Table 3.3 to Table 3.13 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.~~
- 3.1.4 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	Suffolk County Council's Position	Status
Strategic options/needs case				
3.2.1	Needs case	<p>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.</p> <p>Norwich to Tilbury is listed as a key project in Appendix 2 of the NESO Clean Power 2030 Report.</p>	<p>SCC Response to Statutory Consultation (29/07/2024):</p> <p>In accordance with the Council's Energy and Climate Adaptive Infrastructure Policy, SCC recognise the importance of the Norwich to Tilbury proposals as part of the required infrastructure to connect low carbon energy generation developments that will deliver energy security and contribute to UK government targets.</p>	Agreed
3.2.2	Project timing	<p>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.</p> <p>Appendix 2 of the NESO Clean Power 2030 Report shows that the constraint costs associated with a delay to the</p>	<p>SCC Response to Statutory Consultation (29/07/2024):</p> <p>SCC request National Grid (NGET), (and Ofgem recognising the applicant's licence obligations) to pause the Norwich to Tilbury proposals, to enable the effective consideration of alternatives (such as HVDC or offshore).</p> <p>SCC position to be updated following receipt of documents anticipated at Deadline 1.</p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>project timing as being between £2.7 and £2.8 billion.</p> <p><u>Updated Position (February 2026): National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</u></p>		
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><u>Updated Position (February 2026): National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</u></p>	<p>SCC Response to Targeted Consultations (03/03/2025):</p> <p>SCC considers that credible alternatives such as an offshore centred approach or High Voltage Direct Current undergrounding, delivered at pace, to minimise onshore infrastructure in Suffolk should be explored fully.</p> <p><u>SCC position to be updated following receipt of documents anticipated at Deadline 1.</u></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</p>	<p>SCC Response to Targeted Consultations (03/03/2025):</p> <p>SCC considers that credible alternatives such as an offshore centred approach or High</p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>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 HVDC cables, 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 believe that this would be the most suitable option as all costs ultimately go onto domestic energy bills.</p> <p>Updated Position (February 2026): National Grid provided a response to this matter at Deadline 1 through the relevant representations process (document reference 8.4.1).</p>	<p>Voltage Direct Current undergrounding, delivered at pace, to minimise onshore infrastructure in Suffolk should be explored fully.</p> <p>SCC position to be updated following receipt of documents anticipated at Deadline 1.</p>	
Project development process - Design				
3.2.5	Waveney Valley	<p>At statutory consultation in 2024, National Grid presented proposals for an overhead line across the Waveney Valley, along with an underground</p>	<p>SCC Response to Targeted Consultations Consultations (03/03/2025): SCC regrets proposals for the Waveney Valley Alternative have not been taken</p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>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> <p>Mitigation, including landscape enhancement, will be discussed in relevant thematic group meetings with National Grid's EIA team and SCC's topic specialists.</p>	<p>forward. Although there was a clear preference from all four local authorities (Suffolk County Council, Mid Suffolk District Council, Norfolk County Council, South Norfolk District Council) for undergrounding, technical issues seemingly make this an unrealistic proposition. To offset the undoubted visual and landscape impacts that will result from the use of overhead lines, SCC asks for a compensatory approach. This should entail a programme of landscape enhancements and undergrounding of existing 132kV lines.</p>	
3.2.6	Removal of existing 132kV	<p><u>National Grid's consideration of its duty in relation to the Project to seek to further the purpose of the National Landscape, which is to 'conserve and enhance natural beauty' in accordance with s85 of the CRoW Act, is set out in the National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) (APP-120). Part of this approach includes the provision of a Dedham Vale National Landscape Fund in addition to the commitment to an initial feasibility study to assess feasibility for the potential PJ Line removal, an</u></p>	<p>SCC Response to Targeted Consultation Consultations (03/03/2025):</p> <p>SCC is keen to see the removal of an existing 132kV local distribution overhead line which runs through both the Suffolk and Essex Coast and Heaths the Dedham Vale National Landscapes. SCC considers that removal would go a long way towards meeting section 85 of the CRoW Act, which requires relevant authorities to “seek to further the purpose of conserving and enhancing the natural beauty of the area” when discharging their functions in Areas of Outstanding Natural Beauty (locally known as National Landscapes).</p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>existing UK Power Networks overhead line running between Lawford and south of Bramford. The measures identified are sufficient, appropriate and proportionate in accordance with Defra guidance and national policy.</u></p> <p><u>Updated Position (February 2026): The additional measures are proposed to be secured by a legal agreement.</u></p> <p><u>Engagement with the Dedham Vale National Landscape Partnership and relevant stakeholders is ongoing. The Project is following the approach set out in the DEFRA guidance on 'seeking to further the purposes of National Landscapes'— Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes— GOV.UK. Part of this approach could include exploring the potential feasibility of removing the existing 132kV overhead line which runs through both the Suffolk and Essex Coast and Heaths the Dedham Vale National Landscapes and is owned and operated by UK Power Networks. National Grid intend to engage with the relevant stakeholders on agreeing a proportionate approach to the duty and the potential opportunities for consideration.</u></p>		

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
Project development process - Consultation				
3.2.7	2022 non-statutory consultation	<p>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.</p> <p>The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.</p>	SCC provided full comments regarding the project in the response to the 2022 non-statutory consultation.	Agreed
3.2.8	2023 non-statutory consultation	<p>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.</p> <p>The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.</p>	SCC provided full comments regarding the project in the response to the 2023 non-statutory consultation.	Agreed
3.2.9	2024 statutory consultation	<p>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). Responses to feedback received during statutory consultation will be made available at DCO submission within the Consultation Feedback Report.</p>	SCC provided full comments regarding the project in the response to the 2024 statutory consultation.	Agreed

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
3.2.10	2025 targeted consultation	<p>The statutory consultation was undertaken in accordance with the published SoCC.</p> <p>Targeted consultations for Suffolk 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 will be made available at DCO submission within the Consultation Feedback Report.</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>	<p>SCC provided full comments regarding the project in the response to the 2025 targeted consultation.</p>	Agreed

Other matters as required

3.2.11	Community Benefits	<p><u>Updated Position (February 2026): Socio-economic impacts on the local economy and the tourism sector are assessed assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and</u></p>	<p>SCC has been clear in its stance that community benefits should be offered for all communities hosting Nationally Significant Infrastructure. Whilst community benefits cannot be considered within the planning balance, this solely means that benefits</p>	Under discussion
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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>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><u>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 the decision on the Project or a matter to be secured as part of the Development Consent Order (, the planning process. Outside of the DCO), as per the Community Funds for Transmission Infrastructure: Guidance</u></p>	<p>should be above and beyond any mitigation or compensation embedded within the project. SCC considers that the Government's March 2025 community benefit guidance provides sufficient clarity on the level of funding expected.</p> <p>SCC has provided National Grid with its preferences and suggestions for Community Funds including potential delivery opportunities. SCC also considers that National Grid should tailor the benefits to the desires of the communities affected. These preferences should be identified via direct consultation with the <u>Town and</u> Parish Councils and analysis of Neighbourhood Plans (where made).</p>	

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>(DESNZ, 2025) 14.. Therefore, any community benefit or investment would be captured under the process, National Grid Community Grant Scheme and dealt with stakeholders to understand the opportunity and delivery of this funding, in line with separately to the EIA guidance.</p>		
3.2.12	Supply and connectivity around the Freeport at Gateway 14	<p>National Grid liaises regularly with electricity Distribution Network Operators (DNO). In East Anglia that is UK Power Networks (UKPN). Potential opportunities to rationalise, or make new connections to, the local network, or high demand centres, such as Gateway 14 requires a combination of the developer, the DNO and National Grid identifying a need case that would be supported by the regulator, the Office of gas and electricity markets (Ofgem), or funded by some other means. National Grid is required under its transmission licence, to make connections where applications are made including to local networks or demand centres. If a connection application is made National Grid would progress it accordingly.</p>	<p>SCC Response to Statutory Consultation (29/07/2024): SCC's clear preference is that this project should, in coordination with other infrastructure promoters and owners, resolve local supply and connectivity issues in the Stowmarket area for, and around, the Freeport at Gateway 14.</p>	Under discussion

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	Suffolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.3.1	Policy and legislation	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) [APP-126] and Section 8.2 of Chapter 8 (Ecology and Biodiversity) of the ES [AS-026] . All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	SCC have yet to see the ES. The policy and legislation detailed <u>and implemented</u> within the <u>ES are considered</u> PEIR <u>appeared</u> appropriate in <u>their</u> breadth and content for the ES . We expect these same policies, guidance and legislation are <u>implemented and considered in the assessment of the outstanding additional survey data and assessments (to be provided) followed within the ES</u> and will seek confirmation once <u>these documents have the ES has</u> been issued.	Under discussion Agreed
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 [AS-026] . <u>Updated Position (February 2026):</u>	<u>SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025:</u> <u>The ES states that SCC have been informed that c.c.12.55% of the study areas survey data and assessments are yet to be provided. Providing the same methods of data collection and assessment have been</u>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>Further survey information from the 2025 season has been submitted to the Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits. SCC comments are noted, and NG will continue to engage with SCC on this matter.</p>	<p>followed we would anticipate these to be appropriate for the purposes of the assessment. We await publication of this data to confirm we are content with its extent and the methodologies used. SCC await to see a clear description of the locations, extent and description of any areas which remain unsurveyed, following the release of these documents, in order to confirm whether the presumptive approach regarding habitat type, likely value and potential for faunal groups has been adequately considered. SCC have been informed that c.15% of the study area has not yet been subject to detailed survey, due to issues including access constraints. We consider this to be a significant proportion of the study area and feel that a complete, full and accurate assessment of overall and cumulative impacts of the project cannot be completed with this lack of data. SCC are not content that a presumptive of habitat type and "moderate value" can be ascertained through desk study alone.</p>	
3.3.4	Assessment Methodology	<p>The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p>	<p>The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p>	Agreed
3.3.5	Survey Methodology	<p>National Grid issued a Technical Note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.</p>	<p>Methodologies and scope as detailed within the ES are considered appropriate. SCC email 4th November 2024 — Ecology — consultants have placed emphasis on</p>	<p>Under discussion Agreed</p>

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		All methodologies for surveying licensable species have been agreed with Natural England. SCC comments are noted, and NG will continue to engage with SCC on this matter.	methodologies with a consequent lack of survey information.	
3.3.6	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 [AS-026] . The key parameters and assumptions presented are considered appropriate. <u>Updated Position (February 2026):</u> SCC comments are noted, and National Grid will continue to engage with SCC on this matter.	SCC provided the following <u>comments</u> Suffolk County Council have yet to see the ES. Subsequently we cannot yet comment on their review the <u>appropriateness or otherwise</u> of the <u>Statement of Common Ground dated 21 October 2025:</u> SCC are content the <u>key parameters and assumptions contained within the ES are appropriate</u> . Confirmation that these <u>same parameters and assumptions have been applied to the outstanding data to be released and any unsurveyed area will require confirmation once available for scrutiny and review.</u>	Under discussion

EIA – Baseline Conditions

3.3.7	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 [AS-026] . The baseline conditions and receptors presented are considered appropriate. <u>Updated Position (February 2026):</u>	SCC provided the following <u>comments on their review of the Statement of Common Ground dated 21 October 2025:</u> Suffolk County Council are content with the <u>appropriateness of the information presented within the ES.</u> Suffolk County Council have yet to see the ES. We have also requested but are yet to	Under discussion Agreed
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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<u>Further survey information from the 2025 season has been submitted to Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits.</u>	be provided with the primary data associated with field surveys for the project. The incomplete survey coverage of sections of the scheme at this time for all or some ecological receptors means it is not considered possible to fully identify the baseline conditions within the site. Subsequently we cannot yet comment on the appropriateness or otherwise of the baseline conditions and receptors.	

EIA – Embedded, Standard and Additional Mitigation Measures

3.3.8	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 [AS-026]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><u>Updated Position (February 2026):</u> <u>Further survey information from the 2025 season has been submitted to Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits.</u> <u>National Grid will continue to engage with SCC regarding this matter.</u></p>	<p>SCC provided<u>Suffolk County Council have yet to see the following comments on their review of ES. Subsequently we cannot yet comment on the</u> <u>Statement of Common Ground dated 21 October 2025:</u></p> <p><u>The incomplete survey coverage of sections of the scheme at this time for all or some ecological receptors means it is not considered possible to fully identify the requirement for, nor appropriateness or adequacy of the</u> embedded mitigation measures in these areas. SCC will be able to comment on release of the outstanding information in November 2025.</p> <p>-</p>	Under discussion
3.3.9	Standard mitigation	<p>Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction</p>	<p>The mitigation measures included within the Outline CoCP are considered<u>were</u> appropriate based on the receptors</p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>are summarised in Section 8.6 of Chapter 8 (Ecology and Biodiversity) of the ES [AS-026] and set out in the Outline CoCP [APP-300] [document reference 7.2]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><u>Updated Position (February 2026):</u> Further survey information from the 2025 season has been submitted to Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits.</p> <p><u>National Grid will continue to engage with SCC regarding this matter.</u></p>	<p>identified to date. Additional, <u>currently outstanding</u>, survey results may lead to additional mitigation measures being required for currently unidentified receptors. <u>SCC can confirm the appropriateness and adequacy of the mitigation following release of the outstanding survey data and associated assessments.</u></p>	
3.3.10	Additional mitigation	<p>The consideration of additional mitigation measures is are presented in Section 8.6 of Chapter 8 (Ecology and Biodiversity) of the ES [AS-026]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><u>Updated Position (February 2026):</u> Further survey information from the 2025 season has been submitted to Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits.</p>	<p><u>SCC provided the following comments</u> Suffolk County Council have yet to see the ES. Subsequently we cannot yet comment on their review of the Statement of Common Ground dated 21 October 2025:</p> <p><u>SCC are content with</u> the appropriateness and adequacy or otherwise of the additional measures with regard to the receptors and assessments identified within the ES. <u>Additional, currently outstanding, survey results may lead to additional</u> mitigation measures <u>being required for currently unidentified receptors.</u> SCC can confirm the <u>appropriateness and adequacy, or otherwise, of the mitigation following</u></p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<u>National Grid will continue to engage with SCC regarding this matter.</u>	<u>release of the outstanding survey data and associated assessments.-</u>	
EIA – Assessment Conclusions				
3.3.11	Construction effects	<p>The assessment of effects during construction is presented in Section 8.7 of Chapter 8 (Ecology and Biodiversity) of the ES [AS-026]. The assessment of effects during construction presented is considered appropriate.</p> <p><u>Updated Position (February 2026): SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</u></p>	<p><u>SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025:</u></p> <p><u>Suffolk County Council are content with the have yet to see the ES. Subsequently we cannot yet comment on the appropriateness or otherwise of the assessment of effects. Particularly in the receptors as detailed within the ES. Appropriateness of the assessment of outstanding surveyadditional absence of all baseline data cannot be determined until it has been released and scrutinised.-</u></p>	Under discussion
3.3.12	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 8.7 of Chapter 8 (Ecology and Biodiversity) of the ES [AS-026]. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p><u>Updated Position (February 2026): Further survey information from the 2025 season has been submitted to Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits.</u></p>	<p><u>SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025:</u></p> <p><u>Suffolk County Council are content with the have yet to see the ES. Subsequently we cannot yet comment on the appropriateness or otherwise of the assessment of effects. Particularly in the receptors as detailed within the ES. Appropriateness of the assessment of outstanding surveyadditional absence of all baseline data cannot be determined until it has been released and scrutinised.-</u></p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		National Grid will continue to engage with SCC regarding this matter.		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.3.13	Outline CoCP	<p>The Outline CoCP [APP-300] includes all relevant construction related mitigation measures specified in Chapter 8 (Ecology and Biodiversity) of the ES [AS-026] 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 [APP-300].</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP [APP-300].</p> <p>A further iteration of the Outline CoCP [APP-300] was issued in May 2025 following the meeting and feedback in writing.</p> <p><u>Updated Position (February 2026):</u> <u>SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</u></p>	<p><u>SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025:</u></p> <p><u>Suffolk County Council are content with the appropriateness of the CoCP for managing impacts as outlined within the ES. Appropriateness of the CoCP to manage impacts on the receptors of the scheme which have not yet been detailed or assessed, can only be determined following release of this information and subsequent scrutiny. We would expect the CoCP to be modified to reflect any additional receptors, mitigation, impacts or extent of these, as required, following release of these additional documents.</u></p> <p><u>Suffolk County Council have yet to see the ES. Subsequently we cannot yet comment on the appropriateness or otherwise of the Outline CoCP for this purpose. Particularly in the additional absence of all baseline data.</u></p>	Under discussion
3.3.14	Outline LEMP	<p>The Outline LEMP [AS-046] includes all relevant operational related mitigation measures specified in Chapter 8 (Ecology and Biodiversity) of the ES [AS-026] and is appropriate.</p>	<p><u>SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025:</u></p> <p><u>Suffolk County Council are content with the scope and appropriateness of the LEMP for the receptors and impacts identified and assessed within the ES. Appropriateness of</u></p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>Meeting held in October 2024 to agree on the structure for the Outline LEMP [AS-046].-</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline LEMP [AS-046].-</p> <p>A further iteration of the Outline LEMP [as-046] was issued in May 2025 following the meeting and feedback in writing.</p> <p><u>Updated Position (February 2026):</u> <u>SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</u></p>	<p><u>the LEMP in regard to receptors of the scheme which have not yet been detailed or assessed, can only be determined following release of this information and subsequent scrutiny. We would expect the LEMP to be modified to reflect any additional receptors, mitigation, impacts or extent of these, as required, following release of these additional documents.</u></p> <p><u>Suffolk County Council have yet to see the ES. Subsequently we cannot yet comment on the appropriateness or otherwise of the Outline CoCP for this purpose. Particularly in the additional absence of all baseline data.</u></p>	
3.3.15	<u>Breeding / wintering passage birds mitigation</u>	<p><u>The reference in Table 8.23 within Chapter 8 (Ecology and Biodiversity) of the ES [AS-026] to habitat creation/enhancement associated with Biodiversity Net Gain (BNG) relates solely on the measures proposed to address permanent habitat loss at the project level. It is not relied upon as mitigation for <u>breeding birds or wintering/passage birds in order to achieve no significant residual effect.</u> Mitigation for these receptors is provided through established construction phase measures and habitat reinstatement, as set out in the Outline LEMP [AS-046].</u></p>	<p>SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025:</p> <ul style="list-style-type: none"> <u>Table 8.23 in Chapter 8 indicates that mitigation for loss of habitat for both breeding and winter/passage birds will be at least partially provided by habitat creation/enhancement associated with BNG. BNG is intended to provide a gain to biodiversity and whilst it may provide enhancement to these groups it should not be relied upon to mitigate loss of habitat. The reference to BNG as mitigation habitat should be removed and if this leaves a subsequent lack of mitigation for the proposed impact upon these receptors, alternative mitigation</u> 	<u>Under discussion</u>

		<u>must be provided to ensure no overall negative impact.</u>		
3.3.16	<u>Plant Mixes</u>	<u>The Outline LEMP [AS-046] refers to the replacement planting using the same species as removed or another species locally appropriate. It also includes the requirement for the use of native species.</u>	<p>SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025:</p> <ul style="list-style-type: none"> • <u>Mitigation regarding replacement, enhancement and/or creation of habitat should include a commitment to using seed and plants of local provenance in addition to being native. The species and mixes should also be as relevant as possible to the local vicinity of each mitigation area based on information from LNRS and local wildlife organisations.</u> 	<u>Under discussion</u>

Other matters as required

3.3.17	<u>Biodiversity Net Gain (BNG) – Onsite, Offsite and assessment</u>	<p>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]</u> sets out the <u>approach to BNG.</u> Offsite BNG will be delivered through collaboration with partners and purchased from commercially registered providers.</p> <p>National Grid shared the Biodiversity Net Gain strategy with stakeholders in January 2025.</p> <p><u>Updated Position (February 2026):</u> <u>SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</u></p>	<p>SCC provided the following comments on their review of the Statement of Common Ground dated 21st October 2025:</p> <ul style="list-style-type: none"> • <u>SCC welcomes the overall provision of a minimum 10% BNG from the scheme. BNG areas should be selected and provided on an as close to impact as possible principle.</u> 	<u>Under discussion</u>
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3.3.1845 Draft

~~Arboricultural~~Arboriculture
Impact Assessment (AIA)

National Grid issued the draft AIA in March 2025.

The AIA was submitted as part of the draft DCO as Environmental Statement Appendix 13.6: **Arboricultural Impact Assessment [APP-236]**.

Paragraph 9.2.3 of **7.4 Outline Landscape and Ecological**

Management Plan (LEMP) [AS-046] confirms that “Trees and shrubs will be of local provenance to minimise the spread of pests and diseases. Efforts will be made to source planting stock (procured as early as possible) from local nurseries”. Indicative planting schedules sit with **7.4 Outline**

Landscape and Ecological Management Plan (LEMP) [AS-046].

It is recognised that there may be minor refinements to the planting schedules through the examination process and as details designs develop as part of the application for development consent. Paragraph 9.2.5 goes on to state, “...If difficulties arise with sourcing the proposed species mixes, alternative species will be discussed and agreed with the relevant LPA”.

The Outline LEMP [AS-046] section 8.2.3, and commitment GG14 of the Outline CoCP [APP-300], states that “following detailed design and prior to construction (of relevant parts of the Project), relevant surveys will be

SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025:

- 3 to 1 replacement commitment is paramount when providing compensation. Local provenance not just native species for all tree planting should be default when selecting stock.

During unforeseen works during construction any tree loss should be avoided wherever possible through seeking of alternative measures e.g. traffic management rather than visibility splays for temporary access points.

Under discussion

undertaken of arboricultural features that may be impacted or need to be removed to ensure any tree/ hedgerow removal is reduced as far as practicable”.

Updated Position (February 2026): National Grid will continue to engage with SCC on this matter.

3.4 Contaminated Land, Geology 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	Suffolk 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) [APP-126] and Section 9.2 of Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES [APP-181]. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	<u>SCC have not provided further comment in their review of the Statement of Common Ground on 21 October 2025 or during their relevant representations on this matter. It is assumed that further discussion is required. SCC position pending sight of the ES</u>	Under discussion

EIA – Approach and Methods

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
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 [APP-181].	<u>SCC have not provided further comment in their review of the Statement of Common Ground on 21 October 2025 or during their relevant representations on this matter. It is assumed that further discussion is required. SCC position pending sight of the ES</u>	Under discussion
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 Opinion received from the Planning Inspectorate.	Agreed
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 [APP-181]. The key parameters and assumptions presented are considered appropriate.	<u>SCC have not provided further comment in their review of the Statement of Common Ground on 21 October 2025 or during their relevant representations on this matter. It is assumed that further discussion is required. SCC position pending sight of the ES</u>	Under discussion
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	<u>SCC have not provided further comment in their review of the Statement of Common Ground on 21 October 2025 or during their relevant representations on this matter. It is</u>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		(Contaminated Land, Geology and Hydrogeology) of the ES [APP-181]. The baseline conditions and receptors presented are considered appropriate.	assumed that further discussion is required. SCC position pending sight of the ES	

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 [APP-181]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	SCC have not provided further comment in their review of the Statement of Common Ground on 21 October 2025 or during their relevant representations on this matter. It is assumed that further discussion is required. SCC position pending sight of the ES	Under discussion
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 [APP-181] and set out in the Outline CoCP [APP-300], document reference 7.2 . The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	SCC have not provided further comment in their review of the Statement of Common Ground on 21 October 2025 or during their relevant representations on this matter. It is assumed that further discussion is required. SCC position pending sight of the ES	Under discussion
3.4.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 9.6 of Chapter 9 (Contaminated Land, Geology and	SCC have not provided further comment in their review of the Statement of Common Ground on 21 October 2025 or during their relevant representations on this matter. It is	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		Hydrogeology) of the ES [APP-181]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	assumed that further discussion is required. SCC position pending sight of the ES	
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 [APP-181]. The assessment of effects during construction presented is considered appropriate.	SCC have not provided further comment in their review of the Statement of Common Ground on 21 October 2025 or during their relevant representations on this matter. It is assumed that further discussion is required. SCC position pending sight of the ES	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 [APP-181]. The assessment of effects during operation (and maintenance) presented is considered appropriate.	SCC have not provided further comment in their review of the Statement of Common Ground on 21 October 2025 or during their relevant representations on this matter. It is assumed that further discussion is required. SCC position pending sight of the ES	Under discussion
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.4.12	Outline CoCP	The Outline CoCP [APP-300] includes all relevant construction mitigation measures specified in Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES [APP-181] and is appropriate for managing construction impacts from the Project.	SCC have not provided further comment in their review of the Statement of Common Ground on 21 October 2025 or during their relevant representations on this matter. It is assumed that further discussion is required. SCC position pending sight of the ES	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>Meeting held in October 2024 to agree on the structure for the Outline CoCP [APP-300].-</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP [APP-300].-</p> <p>A further iteration of the Outline CoCP [APP-300] was issued in May 2025 following the meeting and feedback in writing.</p>		
Other matters as required				

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	Suffolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.5.1	Policy and legislation	<p>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) [APP-126], Section 10.2 of Chapter 10 (Health and Wellbeing) [APP-192], Section 7.2 of Chapter 7 (Air Quality) [APP-147] and Section 14.2 of Chapter 14</p>	<p><u>SCC provided the following comments on their review of the Statement of Common Ground dated 6 November 2025:</u></p> <ul style="list-style-type: none"> <u>Chapter 10 coverage is not fully comprehensive as neither the Suffolk Office of Data & Analytics (SODA), the Suffolk Joint Local Health and Wellbeing Strategy 2022–2027 nor the Suffolk Joint Strategic Needs Assessment (JSNA) appear to be considered. The Suffolk</u> 	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>(Noise and Vibration) [APP-256] of the ES.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p>NG provided the following responses to matters raised on 6 November 2025:</p> <ul style="list-style-type: none"> Paragraph 10.2.16 of ES Chapter 10: Health and Wellbeing (6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]) states that local health and wellbeing strategies, Joint Strategic Needs Assessments and the health priorities they contain, have been used to inform the health and wellbeing assessment. The Suffolk County Council JSNA and Health and Wellbeing Strategy are both referenced within the bibliography and have been reviewed as part of our methodology. We would like to highlight that Table 10.1 should have included a row specifically relating to health priorities identified in these documents and that this is an omission that has been captured within our Errata Document following submission. However, we would like to affirm that the Suffolk Health and 	<p><u>Health and Wellbeing Strategy is only briefly mentioned as a baseline source elsewhere in the chapter, with the JSNA referred to in the Bibliography only.</u></p> <p>Following text throughout this column has been populated in respect to the PIER unless otherwise stated:</p> <p>Chapter 2 is not specific to H&WB. Public Health & Communities cannot comment as to whether all relevant legislation, policy and guidance has been identified and/or considered.</p> <p>2.4 is missing reference to Ipswich Local Plan</p> <p>Section 10.2 – Note 10.2.12 does not include SCC's 'Community Engagement and Wellbeing Supplementary Guidance Document'</p> <p>Public Health have no comments to make in respect of Noise and Vibration throughout</p>	

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>Wellbeing Strategy is referenced elsewhere in Chapter 10: Health and Wellbeing (document reference 6.10) [APP-192] (for example in paragraph 10.5.16). Other paragraphs in Section 10.5 (Baseline Conditions) make reference to JSNAs more generally where they allude to trends or issues common to a number of local authorities (rather than highlighting every individual instance of an issue being raised); for example paragraph 10.5.22 states that 'mental health and wellbeing is a priority identified in the majority of the JSNAs and Health and Wellbeing Strategies of local planning authorities within the Wider Study Area'.</u></p> <p><u>Updated Position (February 2026):</u> SCC comments are noted, and <u>National Grid</u> will continue to engage with SCC on this matter.</p>		

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
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.	<u>Public Health have no comments to make in respect of air quality.</u>	Agreed

3.5.3	Data sources	<p>Sufficient desktop data has been collected to inform the assessment as presented within Section 10.4 of Chapter 10 (Health and Wellbeing) [APP-192], Section 7.54 of Chapter 7 (Air Quality) [APP-147] and Section 14.4 of Chapter 14 (Noise and Vibration) [APP-256] of the ES.</p> <p>NG provided the following responses to matters raised on 6 November 2025:</p> <p>Section 10.4 lists the data sources that have been used to identify the baseline and inform the health and wellbeing assessment. Section 10.5 presents a summary analysis of baseline data. Appendix 10.1: Health and Wellbeing Baseline Statistics [APP-193] and Figures 10.2 to 10.14 [APP-195 to APP-207]. These data sources are considered to provide appropriate data to enable a proportionate assessment to be undertaken. Similarly, sections 7.4 and 14.4 of the ES Air Quality and Noise Chapters respectively [APP-147 and APP-256] reference data sources for the respective assessments; baseline data for each topic is summarised in Sections 7.5 and 14.5 for Air Quality and Noise respectively. See response to ID3.5.1 in relation to consideration of the Suffolk Joint Strategic Needs Assessment.</p>	<p>Section 10.4 and 7.4 - there is no data detailed in either Section</p> <p><u>SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025:</u></p> <ul style="list-style-type: none"> Neither the Place Based Needs assessment (PBNA), Suffolk Office of Data & Analytics (SODA) nor the Suffolk Joint Strategic Needs Assessment (JSNA) are considered (e.g. no mention in Table 10.1). The JSNA is referred to in the Bibliography only. <p>SCC consider that, regarding Air Quality, the relevant data available has been used. Public Health have no comments to make in respect of Noise and Vibration throughout</p>	Under discussion
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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
3.5.4	Assessment methodology	<p>A meeting was held in September 2024 to agree the assessment methodology of the Health and Wellbeing ES chapter.</p> <p>National Grid issued the Health and Wellbeing Technical Note—Refreshed Approach in October 2024.</p> <p>December 2024, National Grid held an additional meeting to discuss and agree the proposed assessment scope and methodology for the Health and Wellbeing chapter of the ES.</p> <p>National Grid can confirm that reference to Suffolk's JSNAs and PBNAs has been included within our baseline section.</p> <p>NG can also confirm that summary and context relating to cumulative impacts as they are relevant to health and wellbeing, noting in particular the various NSIPs live in the area, will be included within the Cumulative Assessment.</p> <p><u>NG provided the following responses to matters raised on 6 November 2025:</u></p> <p><u>The Place Based Needs Assessment Tool was reviewed following the Health and Wellbeing Thematic Group meetings; the tool utilises Census data to provide information relating to population, age, ethnicity, disability. This information is considered to have</u></p>	<p>Feedback received on the Technical Note from SCC dated 11th October 2024: Request to pay regard to Suffolk's Joint Strategic Needs Assessment (JSNA) and Place-based needs assessment (PBNA).</p> <p>Cumulative Impacts. Please include some summary and context on the implications, noting there are various NSIP's in the area. Public Health did not attend the<u>this</u> meeting, we therefore cannot confirm any agreements made within it.</p> <p><u>SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025:</u></p> <p><u>Neither the PBNA, Suffolk Office of Data & Analytics (SODA) nor the Suffolk Joint Strategic Needs Assessment (JSNA) are considered (e.g. no mention in Table 10.1). The JSNA is referred to in the Bibliography only.</u></p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
3.5.5	Key parameters and assumptions	<p><u>been adequately provided within ES Chapter 10 [APP-192] (Section 10.5 and Appendix 10.1 as referenced above [APP-193]). See response to ID3.5.1 in relation to consideration of the Suffolk Joint Strategic Needs Assessment.</u></p>	<p><u>SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025:</u></p> <p><u>It is the view of Public Health that the proposed core working hours of 07:00–19:00 (weekdays) and 07:00–17:00 (weekends and bank holidays) exceed those considered appropriate to safeguard public health and raise material concerns regarding potential impacts on health and residential amenity. The inclusion of weekend and bank holiday working, as well as the potential for night working for trenchless crossings and other exceptions, raises concerns about the adequacy of protection for public health and residential amenity. The Applicant's reliance on management plans (CoCP, CTMP, etc.) for mitigation is noted, however there is a risk that extended hours, night working, and start-up/close-down activities could result in unacceptable levels of noise, disturbance, and stress for local residents, particularly those in rural and semi-rural locations close to the works. Section numbers are different, key parameters and assumptions are sections 7.5, 10.5</u></p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>week. These shift patterns would be rolling, and with workers not 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 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.</u></p> <p><u>Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing 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</u></p>	<p>Section 10.5.16-10.5.21 inclusive—the parameters and assumptions appear reasonable.</p> <p>Section 7.5—the parameters and assumptions appear reasonable.</p> <p>Public Health have no comments to make in respect of Noise and Vibration throughout (assuming this would be reviewed by Environmental Health?)</p>	

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>and avoid extended impacts on communities, traffic networks, landholdings, and the environment.</u></p> <p><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. Such a restriction would also undermine the deliverability of this critical national priority project, where timely delivery is in the public interest.</u></p> <p><u>The Applicant considers that the proposed approach therefore represents a balanced and proportionate control, providing flexibility to maintain programme resilience while retaining safeguards through other DCO control to manage impacts included in Table 6.1 of 7.2 Outline Code of Construction Practice [APP-300] (Outline CoCP), including controls on nuisance generating activities (GG17), traffic impacts (GG33), dust (AQ01), lighting (GG26), monitoring and compliance (GG09, GG01), applications for prior consent under Section 61 of the Control of Pollution Act 1974 (NV03)</u></p>		

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		and advance community notification (GG30).		

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) [APP-192], Section 7.5 of Chapter 7 (Air Quality) [APP-147] and Section 14.5 of Chapter 14 (Noise and Vibration) [APP-256] of the ES. The baseline conditions and receptors presented are considered appropriate.</p> <p>SCC comments are noted, and NG provided the following responses will continue to matters raised engage with SCC on 6 November 2025:</p> <p>SCC note that some of the protected characteristics (namely Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion or belief, Sex and Sexual orientation) are not included in the baseline data review. Table 10.5 of Chapter 10: Health and Wellbeing [APP-192] identifies those vulnerable groups considered to be relevant to the assessment (i.e. those for which evidence suggests that there may be potential impacts arising from the project); data has been collated for these groups. An Equality Impact Assessment has been prepared for</p>	<p>Baseline conditions are sections 7.6 and 10.6.</p> <p>Section 7.6 - The baseline conditions and receptors presented appear reasonable.</p> <p>Section 10.6 does not include some of the protected characteristics namely Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion or belief, Sex and Sexual orientation. These aside, the baseline conditions and receptors presented appear reasonable.</p> <p>PH have no comments to make in respect of Noise and Vibration throughout (assuming this would be reviewed by Environmental Health?).</p>	Under discussion
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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>the project (7.14 Equality Impact Assessment [APP-352]) which covers all protected characteristics</u> <u>this matter.</u></p>		
EIA – Embedded, Standard and Additional Mitigation Measures				
3.5.7	Embedded mitigation	<p>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) [APP-192], Section 7.6 of Chapter 7 (Air Quality) [APP-147] and Section 14.6 of Chapter 14 (Noise and Vibration) [APP-256] of the ES. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>Embedded mitigations are sections 7.7 and 10.7.</p> <p>Section 7.7 - Embedded mitigation appears reasonable, in terms of its nature and scale, to address potential effects at this stage (10/02/2025).</p> <p>Section 10.7 - Embedded mitigation appears reasonable at this stage (10/02/2025).</p> <p>Public Health have no comments to make in respect of Noise and Vibration throughout</p>	<p>Under discussion A greed</p>
3.5.8	Standard mitigation	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 10.6 of Chapter 10 (Health and Wellbeing) [APP-192], Section 7.6 of Chapter 7 (Air Quality) [APP-147], Section 14.6 of Chapter 14 (Noise and Vibration) [APP-256] of the ES and set out in the Outline CoCP [APP-300] document reference 7.2]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>Standard mitigations are Sections 7.7 and 10.7</p> <p>Section 7.7 - The standard mitigations appear reasonable, in terms of its nature and scale, to address potential effects.</p> <p>Section 10.7 - The standard mitigation appears reasonable, in terms of its nature and scale, to address potential effects.</p> <p>Public Health have no comments to make in respect of Noise and Vibration throughout.</p> <p>Public Health have not had sight of CoCP and cannot therefore comment upon it.</p>	<p>Under discussion A greed</p>

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
			<p><u>SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025:</u></p> <p><u>Public Health have no comments to make in respect of air quality.</u></p>	
3.5.9	Additional mitigation	<p>The consideration of additional mitigation measures is are presented in Section 10.6 of Chapter 10 (Health and Wellbeing) [APP-192], Section 7.6 of Chapter 7 (Air Quality) [APP-147] and Section 14.6 of Chapter 14 (Noise and Vibration) [APP-256] of the ES. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>Additional mitigations are Sections 7.7 and 10.7</p> <p>Section 7.7 - The additional mitigations appear reasonable, in terms of its nature and scale, to address potential effects at this stage (10/02/2025).</p> <p>Section 10.7 - The additional mitigations appear reasonable at this stage (10/02/2025).</p> <p>Public Health have no comments to make in respect of Noise and Vibration throughout .</p> <p><u>SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025:</u></p> <p><u>No additional mitigation identified relating to air quality beyond embedded and standard as not required. Public Health therefore have no comments on this.</u></p>	Under discussion Agreed

EIA – Assessment Conclusions

3.5.10	Construction effects	<p>The assessment of effects during construction is presented in Section 10.7 of Chapter 10 (Health and Wellbeing) [APP-192], Section 7.6 of Chapter 7 (Air Quality) [APP-147] and Section 14.7 of Chapter 14 (Noise and Vibration) [APP-256] of</p>	<p>Construction effects are Sections 7.8 and 10.8</p> <p>Section 7.7 - the assessment of the effects on air quality during construction appears reasonable at this stage (13/10/2025).</p>	Under discussion
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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>the ES. The assessment of effects during construction presented is considered appropriate.</p> <p><u>National Grid provided the following responses to matters raised on 6 November 2025:</u></p> <ul style="list-style-type: none"> <u>Further detailed construction vibration assessments would be undertaken by the Main Works Contractor(s), as per commitment NV05 of 7.2 Outline Code of Construction Practice [APP-300] based on their specific methodologies. Based on the findings of these assessments specific mitigation measures will be identified, if required, and incorporated into the Noise and Vibration Management Plan (which will be updated from 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]). Given the nature of this location, mitigation options are limited and it is conceded that significant adverse effects may not be avoidable at this location. However, mitigation measures would be put in place to mitigate and minimise impacts as far as practicable. Mitigation measures already incorporated are speed restrictions, and a widening of the</u> 	<p>Section 10.8 - the assessment of effects during construction appears reasonable at this stage (10/02/2025).</p> <p>Public Health have no comments to make in respect of Noise and Vibration throughout. <u>SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025:</u></p> <ul style="list-style-type: none"> <u>12.11 A significant adverse effect from construction traffic noise has been identified at Bentley Road (PAR 30), with a predicted increase of 11.4 dB, exceeding the Significant Observed Adverse Effect Level (SOAEL). The Outline Construction Traffic Management Plan proposes mitigation measures and whilst these measures may help reduce noise, the Environmental Statement acknowledges in 14.7.36 that “major significant adverse effects from construction traffic noise would still be expected on Bentley Road” From a Public Health perspective, it is essential to recognise that the proposed mitigation may not be sufficient to prevent significant adverse impacts on residents’ health and wellbeing. It is recommended that the applicant explores further site-specific mitigation options, this should include ongoing engagement with affected residents and robust monitoring.</u> <p><u>The Chapter identifies in Paragraph 14.7.24 that construction vibration may exceed the Significant Observed Adverse Effect Level</u></p>	

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>road which serves to move vehicles further away from the property.</u></p> <p><u>The construction vibration assessment presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] uses reasonable worst-case assumptions for vibration generating activities and does not include mitigation. As noted, the source of vibration leading to potential exceedances is from vibratory compaction. In practice, this can be readily mitigated by use of an alternative method, such as dead rolling (i.e. not using the vibrator when rolling). As such, in practice, the SOAEL is not expected to be exceeded at any location. Further detailed construction vibration assessments will be undertaken by the Main Works Contractor(s) as per commitment NV05 of 7.2 Outline Code of Construction Practice [APP-300] based on their specific methodologies. Based on the findings of these assessments, specific BPM mitigation measures would be identified, if required, and incorporated into the Noise and Vibration Management Plan (NVMP) (which would be updated from 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and</u></p>	<p><u>(SOAEL) at 74 Noise Sensitive Receptors (NSRs), primarily due to compaction activities associated with highway works, haul road construction, and temporary construction compounds. With mitigation in the form of Best Practicable Means (BPM), the magnitude of impact is expected to be negligible to small at residential and low to medium sensitivity non-residential NSRs, and negligible at high-sensitivity NSRs, resulting in a residual effect that is not significant.</u></p> <p><u>There does however appear to be any explicit commitment to vibration monitoring or detailed site-specific mitigation for vibration in the Outline Construction Traffic Management Plan or the Environmental Statement. From a Public Health perspective, whilst the use of BPM is welcomed, it is recommended that the applicant provides greater clarity on how vibration impacts will be monitored and mitigated during construction.</u></p>	

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>Vibration Management Plan [APP-306]</u>. The Outline NVMP includes protocols for vibration monitoring in situations where works may induce high levels of vibration, and this would form part of the implementation of BPM. Additionally, commitment NV04 of <u>7.2 Outline Code of Construction Practice [APP-300]</u> includes for pre- and post-condition surveys to be conducted in situations where there is a potential for building and structural damage, and includes a commitment to rectify any damage (cosmetic or otherwise) deemed to be caused by the works. However, in practice such high levels of vibration would not be expected, particularly with the implementation of standard BPM</p>		
3.5.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 10.7 of Chapter 10 (Health and Wellbeing) [APP-192], Section 7.7 of Chapter 7 (Air Quality) [APP-147] and Section 14.7 of Chapter 14 (Noise and Vibration) [APP-256] of the ES. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p>	<p>Construction effects are Sections 7.8 and 10.8</p> <p>Section 7.8 - the assessment of effects during operation (and maintenance) presented appears reasonable at this stage (10/02/2025).</p> <p>Section 10.8 - the assessment of effects during operation (and maintenance) appears reasonable at this stage (10/02/2025).</p> <p>Public Health have no comments to make in respect of Noise and Vibration throughout.</p>	Under discussion Agreed

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.5.12	Outline CoCP	<p>The Outline CoCP [APP-300] includes all relevant mitigation measures specified in Chapter 10 (Health and Wellbeing) [APP-192], Chapter 7 (Air Quality) [APP-147] and Chapter 14 (Noise and Vibration) [APP-256] of the ES and is appropriate for managing construction impacts from the Project.</p> <p>National Grid provided the following responses <u>Meeting held in October 2024 to matters raised agree on 6 November 2025:</u></p> <p>Outline noise and vibration mitigation measures are described in 7.2 Outline Code of Construction Practice Appendix F – Outline and Vibration Management Plan [APP-306], rather than the structure for the Outline Construction Traffic Management Plan [APP-309]. CoCP.</p> <ul style="list-style-type: none"> Further detailed construction vibration assessments will be undertaken by the contractor, as per Commitment NV05 of 7.2 Outline Code of Construction Practice [APP-300] based on their specific methodologies. Based on the findings of these assessments specific mitigation measures will be identified, if required, and incorporated into the Noise and 	<p>SCC provided Public Health did not attend the following comments on their review of the <u>Statement of Common Ground dated 21 meeting 9th October 2025:</u></p> <ul style="list-style-type: none"> Chapter 14 identifies in Paragraph 14.7.24 that construction vibration may exceed the Significant Observed Adverse Effect Level (SOAEL) at 74 Noise Sensitive Receptors (NSRs), primarily due to compaction activities associated with highway works, haul road construction, and temporary construction compounds. With mitigation in the form of Best Practicable Means (BPM), the magnitude of impact is expected to be negligible to small at residential and low to medium sensitivity non-residential NSRs, and negligible at high-sensitivity NSRs, resulting in a residual effect that is not significant. There does however appear to be, we therefore cannot confirm any explicit commitment to vibration monitoring or detailed site-specific mitigation for vibration in the Outline Construction Traffic Management Plan. From a Public Health perspective, whilst the CoCP commits to “Best Practicable Means” (BPM) and preparation of a Noise and Vibration Management Plan, agreements made within it does not commit to any site-specific mitigation or 	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>Vibration Management Plan (NVMP) (which will be updated from 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]).</u> <u>The Outline NVMP includes protocols for vibration monitoring in situations where works may induce high levels of vibration.</u> <u>Additionally, Commitment NV04 of 7.2 Outline Code of Construction Practice [APP-300] includes for pre- and post- condition surveys to be conducted in situations where there is a potential for building and structural damage and includes a commitment to rectify any damage (cosmetic or otherwise) deemed to be caused by the works.</u></p> <p><u>Updated Position (February 2026):</u> <u>The core working hours are secured in Requirement 7 (Construction Hours) of 3.1 Draft Development Consent Order [APP-058] (draft DCO).</u> <u>The construction works are largely linear and would not 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</u></p>	<p><u>vibration monitoring at NSRs where SOAEL may be exceeded.</u></p> <ul style="list-style-type: none"> <u>ES Chapter 14 (Noise and Vibration) identifies Significant adverse noise effects at Jasmine Cottage (Bentley Road) and other locations due to construction traffic. The Outline CoCP refers to “detailed construction noise and vibration assessments” and a Noise and Vibration Management Plan, but does not commit to continuous or attended noise monitoring at high-risk NSRs or mitigations.</u> <p><u>It is the view of- Public Health that the proposed core working hours of 07:00–19:00 (weekdays) and 07:00–17:00 (weekends and bank holidays) exceed those considered appropriate to safeguard public health and raise material concerns regarding potential impacts on health and residential amenity. The inclusion of weekend and bank holiday working, as well as the potential for night working for trenchless crossings and other exceptions, raises concerns about the adequacy of protection for public health and residential amenity. The applicant's reliance on management plans (CoCP, CTMP, etc.) for mitigation is noted, however there is a risk that extended hours, night working, and start-up/close-down activities could result in unacceptable levels of noise, disturbance, and stress for local residents, particularly those in rural and semi-rural locations close</u></p>	

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		<p><u>means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not 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 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.</u></p> <p><u>Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing 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</u></p>	<p>to the works, have not had sight of CoCP and cannot therefore comment upon it.</p> <p>Recommendation: <u>Core working hours be reduced to more typical levels with no routine working on Sundays or bank holidays, except where essential for safety or agreed with affected residents. Night working be strictly limited to essential activities only, with advance notice, robust justification, and additional mitigation for affected receptors. Start-up and close-down activities be included within the core hours, not permitted outside them. The applicant be required to consult with affected communities and local authorities before agreeing any variations to working hours or mitigation measures.</u></p>	

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>prolonging the programme, this can reduce overall construction duration and avoid extended impacts on communities, traffic networks, landholdings, and the environment.</u></p> <p><u>A blanket prohibition on Sunday, Bank Holiday and other public 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. Such a restriction 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(4) of Schedule 3 of 3.1 draft DCO [APP-056] permits start up and close down activities to take place up to an hour either side of the core working hours. Start up and close down activities are defined in Schedule 3 of the draft DCO. The Applicant considers that the provision for start up and close down activities to be proportionate, justified, and consistent with established practice for Nationally Significant Infrastructure Projects, noting that all such activities remain subject to the application of</u></p>		

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>best practicable means and appropriate mitigation to manage noise and other environmental effects as set out in 7.2 Outline Code of Construction Practice [APP-300].</u></p> <p><u>The Applicant considers that the proposed approach therefore represents a balanced and proportionate control, providing flexibility to maintain programme resilience while retaining safeguards through other DCO control to manage impacts included in Table 6.1 of 7.2 Outline Code of Construction Practice [APP-300] (Outline CoCP), including controls on nuisance-generating activities (GG17), traffic impacts (GG33), dust (AQ01), lighting (GG26), monitoring and compliance (GG09, GG01), applications for prior consent under Section 61 of the Control of Pollution Act 1974 (NV03) and advance community notification (GG30). Meeting held in March 2025 to discuss the second iteration of the Outline CoCP.</u></p> <p><u>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</u></p>		

Other matters as required

3.6 Historic Environment

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

ID	Matter	National Grid's Position	Suffolk 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) [APP-126] and Section 11.2 of Chapter 11 (Historic Environment) of the ES [APP-208].</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	<p>Historic England guidance should be included within chapter 2.6 non-statutory guidance. NPPF should be referenced in chapter 11.</p> <p><u>SCC advised during a call in January 2026 that this matter can be considered agreed.</u></p> <p><u>EPS (Built Heritage) note that based on a further review of the identification and assessment of the value of NDHA buildings in</u></p> <p><u>Document: 6.11.A1 Environmental Statement Appendix 11.1 Historic Environment Baseline Report [APP-209] we are able to agree this matter.</u></p>	Under discussion Agreed
EIA – Approach and Methods				
3.6.2	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
3.6.3	Data sources <u>(Archaeology)</u>	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 [APP-208].	SCC Archaeology - The baseline information presented in chapter 11 of the PEIR provides an initial assessment of the heritage assets, however for archaeology this information has not been used to provide an assessment of archaeological potential. This would be further informed by the results of geophysical survey and trenched archaeological	Under discussion-

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</p>	<p>evaluation. For archaeology the Heritage Asset Value is not the same as archaeological potential.</p> <p>SCC advised during a call in January 2026 that this matter is still Under discussion pending further review of the documents.</p>	
3.6.4	<p>Data sources (Built Heritage)</p>	<p>Updated Position (February 2026): 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 [APP-208].</p> <p>SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</p> <p>Non-designated historic buildings were identified in addition to those included in the HER and Local Lists. This was primarily through historic mapping. The methodology for desk-based research and walkover included identification of any previously unknown heritage assets, including historic buildings. The Historic Environment Baseline Report (6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]) is organised geographically and by period and includes baseline information on non-designated historic buildings. All assessed heritage assets were referred to in text either by their NHLE number in the case of designated assets, or a Project ID number for non-designated assets. The baseline report</p>	<p>EPS Built Heritage confirmed that this matter is agreed following a meeting in January 2026.</p>	Agreed

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>and assessment tables are not structured by asset type as some heritage assets can contain both above ground built elements and archaeological remains.</u></p>		
3.6.5	<p><u>Assessment methodology (Archaeology)</u></p>	<p><u>Updated Position (February 2026): The methodology for assessing Historic Environment was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</u></p>	<p><u>SCC confirmed during a meeting in January 2026 that this matter remains <u>under discussion.</u></u></p>	<p><u>Under discussion</u></p>
3.6.64	<p><u>Assessment methodology (Built Heritage)</u></p>	<p><u>Updated Position (February 2026): The methodology for assessing Historic Environment was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</u></p> <p>The Scoping Opinion stated: “<i>The Applicant should make effort to discuss and agree relevant non-designated heritage assets for assessment and the detailed assessment methodology with relevant local planning authorities.</i>”</p> <p>SCC raised at statutory consultation that they did not agree with the value of Grade II listed buildings as medium value assets. However, there is precedent for the approach proposed and professional judgement is always used when assigning value to heritage assets. Therefore, as per the Scoping Opinion report, the majority of Grade II listed buildings will remain medium value assets.</p> <p><u>National Grid position regarding non-designated heritage assets is as outlined in section 3.6.1 (Policy and Legislation)</u></p>	<p><u>EPS Built Heritage confirmed their agreement on this matter following a call in January 2026. SCC email 4th Nov 2024 – Built heritage – consultant’s methodology not agreed, and all assets affected not identified.</u></p>	<p><u>Under discussion Agreed</u></p>

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		above SCC comments are noted, and NG will continue to engage with SCC on this matter.		
3.6.7	Key parameters and assumptions <u>(Archaeology) Priority Survey Areas</u>	Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of Chapter 11 (Historic Environment) of the ES [APP-208] . The key parameters and assumptions presented are considered appropriate. <u>Updated Position (February 2026): National Grid will continue to engage with SCC on this matter.</u>	The currently available information has been presented within chapter 11, however, the collated information should be used to inform on the initial archaeological potential of sections of the route. This baseline information would then be further informed by geophysical survey and trenched archaeological evaluation. <u>October 2025 – SCC Archaeological Service – This needs to clearly state that the archaeological evaluation is required to fully define key parameters and assumptions. The FULL evaluation will not be completed prior to decision, and this document needs to clearly state that there will be further phase(s) of archaeological evaluation (both Geophysical Survey and Trial Trenching) to inform appropriate archaeological mitigation.</u>	Under discussion
<u>3.6.8</u>	<u>Key parameters and assumptions (Archaeology) Remaining Archaeological Evaluation</u>	<u>Updated Position (February 2026): Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of Chapter 11 (Historic Environment) of the ES [APP-208]. The key parameters and assumptions presented are considered appropriate.</u>	<u>The currently available information has been presented within chapter 11, however, the collated information should be used to inform on the initial archaeological potential of sections of the route. This baseline information would then be further informed by geophysical survey and trenched archaeological evaluation. October 2025 – SCC Archaeological Service – This needs to clearly state that the archaeological evaluation is required to fully define key parameters and assumptions. The FULL evaluation will not be completed prior</u>	<u>Under discussion</u>

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
			<u>to decision, and this document needs to clearly state that there will be further phase(s) of archaeological evaluation (both Geophysical Survey and Trial Trenching) to inform appropriate archaeological mitigation.</u>	
3.6.9	<u>Key parameters and assumptions (Built Heritage)</u>	<u>Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of Chapter 11 (Historic Environment) of the ES [APP-208]. The key parameters and assumptions presented are considered appropriate.</u> <u>February 2025, National Grid issued Historic Environments (HE) Viewpoints information and held a thematic group meeting on the topic.</u> <u>March 2025, National Grid issued an updated version of the Historic Environment (HE) Viewpoints information.</u>	<u>EPS (Built Heritage) is in agreement with the matter following review of the ES.</u>	Agreed

EIA – Baseline Conditions

3.6.108	<u>Baseline conditions and receptors (Archaeology)</u>	<u>The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of Chapter 11 (Historic Environment) of the ES [APP-208]. The baseline conditions and receptors presented are considered appropriate.</u> <u>SCC comments are noted, and NG will continue to engage with SCC on this matter.</u> 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.	SCC Archaeology - 11.5.26 & 11.5.36 — states that there will be non-intrusive and intrusive archaeological evaluation, this should clearly indicate that this will not be completed for the full route for the purposes of the ES, prior to the submission. There must be clear indication for examination that there will be further archaeological evaluation for areas not subject to pre-submission archaeological evaluation. The results of the full archaeological evaluation will inform on archaeological mitigation.	Under discussion
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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>Updated Position (February 2026):</u> National Grid will continue to engage on this matter.</p>	<p><u>SCC Archaeology noted in a meeting in January 2026 that this matter would remain Under discussion whilst survey work continues.</u></p>	
3.6.11	<p><u>Baseline conditions and receptors (Built Heritage)</u></p>	<p>The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of Chapter 11 (Historic Environment) of the ES [APP-208]. The baseline conditions and receptors presented are considered appropriate.</p> <p>SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</p> <p>February 2025, National Grid issued a draft <u>Historic Baseline Report including Annex C and Annex D for agreement/comment and held a meeting on the topic.</u></p> <p>Further detail relevant to this section are outlined in section 3.6.3 (Data Sources).</p>	<p>Following a call in January 2026, EPS (Built Heritage) confirmed agreement on this matter.</p>	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.6.129	<p>Embedded mitigation</p>	<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 [APP-208]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><u>Updated Position (February 2026):</u> National Grid will continue to engage with SCC on this</p>	<p>SCC Archaeology - The embedded mitigation measures need to recognise that there is the potential for the significance of identified heritage assets to increase following further investigation, and for previously unidentified heritage assets of archaeological interest to be identified during the process of evaluation.</p> <p>11.6.2 - There needs to be consideration for organic deposits, such as peats and organic</p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		matter following review of the information contained within the LIR. -	silt deposits, to contain evidence of past environments and human activity. SCC Archaeology have provided further details regarding this matter in the LIR.	
3.6.13	Standard mitigation (Archaeology)	Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of Chapter 11 (Historic Environment) of the ES [APP-208] and set out in the Outline CoCP [APP-300 document reference 7.2] . The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Updated Position (February 2026): National Grid SCC comments are noted, and NG will continue to engage with SCC on this matter following review of the information contained within the LIR.	SCCAS – 11.7 - The archaeological evaluation will not have been completed for the whole route for the purposes of the ES and Examination. Therefore, there would be insufficient baseline information to inform an archaeological mitigation strategy for the whole route. Within the archaeological mitigation strategy and OWSI there should be provision for full archaeological evaluation to be completed to inform on archaeological mitigation. SCC Archaeology have provided further details regarding this matter in the LIR.	Under discussion
3.6.14	Standard Mitigation (Built Heritage)	Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of Chapter 11 (Historic Environment) of the ES [APP-208] and set out in the Outline CoCP [APP-300] The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Regarding commitment H06 the term 'appropriate' in this context refers to the reinstatement of landscape features (such as hedgerows, fences, walls, and earthworks) in a manner that is sensitive to the local character, setting, and historic significance of	This matter is agreed with regards to commitment H06. Whilst we understand that the anticipated effects of construction vibration on designated heritage assets are limited to the Grade II listed Little Bromley War Memorial (1493299) in Tendring District (which is not a dwelling) we would still recommend expansion of H07, to create a hotline or method of contact for building owners who are concerned about the effects of construction vibration on their buildings as works are undertaken to allay fears and allow the monitoring of effects.	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>the area. The general approach and reinstatement plans can be found in Section 9 of 7.4 Outline Landscape and Ecological Management Plan [AS-046]. Specifically, this means:</u></p> <p><u>Replacement features will be of a similar type, scale, and material to those lost, wherever possible, reflecting the character and function of the original feature.</u></p> <p><u>Design and siting will be informed by local landscape character assessments, historic environment records, and where relevant, consultation with Local Planning Authorities and heritage specialists.</u></p> <p><u>Species selection for replanting (e.g., hedgerows) will seek to match historic or locally appropriate species mixes, and construction/restoration of walls or banks will use traditional techniques and materials where feasible.</u></p> <p><u>If retention of a feature is not possible, the replacement or reinstatement will be designed to ensure that the heritage, ecological, and landscape value is maintained, or where possible, enhanced.</u></p> <p><u>Regarding H07 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] did not identify any heritage assets in Colchester, Braintree, Brentwood, Basildon or Thurrock that would be impacted by the Project. The vibration assessment identified one historic structure, the grade II listed Little Bromley War</u></p>		

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<u>Memorial (1493299), in Tendring that has potential to be impacted. As this is not a residence the current approach in H07 and the associated NV04 is considered to be appropriate.</u>		
3.6.1544	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 11.6 of Chapter 11 (Historic Environment) of the ES [APP-208]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><u>Updated Position (February 2026):</u> <u>National Grid will continue to engage on this matter. SCC Archaeology have recently shared updated comments on outline AMS oWSI which we understand form an appendix to the LIR. National Grid are considering these comments and an updated version of the document will be shared later in the examination. SCC comments are noted, and NG will continue to engage with SCC on this matter.</u></p>	<p>The archaeological evaluation will not have been completed for the whole route for the purposes of the ES and Examination. Therefore, there would be insufficient baseline information to inform an archaeological mitigation strategy for the whole route.</p> <p>Within the archaeological mitigation strategy and OWSI there should be provision for full archaeological evaluation to be completed to inform on archaeological mitigation.</p> <p><u>SCC Archaeology note that this matter is secured through the AMS WSI and this will remain Under discussion until the updated document is issued and reviewed.</u></p> <p><u>EPS noted during call in January 2026 that this matter is not relevant for Built Heritage.</u></p>	Under discussion

EIA – Assessment Conclusions

3.6.1642	Construction effects <u>(Archaeology)</u>	<p>The assessment of effects during construction is presented in Section 11.7 of Chapter 11 (Historic Environment) of the ES [APP-208]. The assessment of effects during construction presented is considered appropriate.</p> <p><u>Updated Position (February 2026):</u></p>	<p>Email from SCC – 4th Nov 2024 - Archaeology – consultants not assessing significant areas of 132kV or 400kV cable undergrounding or overhead line tower locations intrusively prior to submission.</p> <p>The archaeological potential of undergrounding of the 132kV, haul road, and temporary construction compound location</p>	Under discussion
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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>National Grid SCC comments are noted, and NG will continue to engage with SCC on this matter following review of the information contained within the LIR.</p>	<p>have the potential to form a constraint on the development if they are not assessed prior to determination.</p> <p>Sites for ecological compensation beyond the order limits have the potential to have significant impacts upon heritage assets, these sites will need to be archaeologically assessed and evaluated to determine if they would be suitable for the purposes of ecological compensation.</p> <p>SCC Archaeology have provided further details regarding this matter in the LIR.</p>	
3.6.17	Construction effects (Built Heritage)	<p>The assessment of effects during construction is presented in Section 11.7 of Chapter 11 (Historic Environment) of the ES [APP-208]. The assessment of effects during construction presented is considered appropriate.</p> <p>SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</p>	<p>Following a call in January 2026, EPS (Built Heritage) confirmed that this matter is agreed.</p>	Agreed
3.6.18	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 11.7 of Chapter 11 (Historic Environment) of the ES [APP-208]. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p>Updated Position (February 2026):</p> <p>National Grid SCC comments are noted, and NG will continue to engage with SCC on this matter following review of the information contained within the LIR.</p>	<p>SCC Archaeology - Any areas of preservation in situ or areas of significance archaeology that are identified during the evaluation, but not impacted by the construction, should be mapped and recorded by National Grid to ensure future maintenance does not disturb these heritage assets.</p> <p>SCC Archaeology have provided further details regarding this matter in the LIR.</p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.6.1944	Outline CoCP	<p>The Outline CoCP [APP-300] includes all relevant construction mitigation measures specified in Chapter 11 (Historic Environment) of the ES [APP-208] 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 [APP-300].</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP [APP-300].</p> <p>A further iteration of the Outline CoCP [APP-300] was issued in May 2025 following the meeting and feedback in writing.</p> <p><u>Updated Position (February 2026):</u> National Grid SCC comments are noted, and NG will continue to engage with SCC on this matter following review of the information contained within the LIR.</p>	<p>SCC Archaeology - 5.1.4 will the LEMP will need to contain a Historic Environment Management Plan. Which will tie all aspects of the historic environment together.</p> <p><u>The submitted OLEMP needs to contain a section requiring the production of a Historic Environment Management Plan/s (HEMP), based upon the results of the completed archaeological evaluation in line with an approved AMS-OWSI.</u></p> <p>5.22- any ecological enhancement measures will need to have appropriate archaeological assessment and evaluation to inform on the suitability of the proposed ecological enhancement for the sites chosen.</p> <p><u>SCC Archaeology have provided further details regarding this matter in the LIR.</u></p> <p><u>For EPS (Built Heritage) See 3.6.13 (Standard mitigation (Built Heritage)) for current position.</u></p>	Under discussion
Other matters as required				
3.6.2045	Overarching Written Scheme of Investigation investigations (WSIs) for pre-consent geophysical surveys and	<p>National Grid shared overarching WSIs in March – June 2024 and December 2024.</p> <p>There are still site specific WSIs forthcoming that have yet to be issued.</p> <p>The scope and methodology of the overarching WSI WSIs for pre-consent geophysical surveys and archaeological trial trenching is considered appropriate and</p>	<p><u>The scope and methodology of the overarching WSI for pre-consent geophysical surveys and SCC Archaeology – This is for the pre-submission archaeological trial trenching is considered appropriate for the pre-consent evaluation.</u></p> <p><u>Pre-consent OWSI only covers, Phase 1 of this is targeting the 'high priority areas, determined by areas' based upon</u></p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
	archaeological trial trenching.	<p>proportionate to the level of evaluation required.</p> <p>Updated Position (February 2026): National Grid note the comments from SCC Archaeology and will continue to engage on this matter. impact anticipated.</p>	<p>construction priorities. This does not cover impacts from other aspects of the scheme, such as the Overhead sections, 400kV undergrounding of 132kV and decommissioning of existing pylons etc.</p> <p>NB. Given the time constraints SCCAS does not believe that NG can deliver the priority area second phase of only. Phase 2 will target other areas, with geophysical survey and trenched archaeological evaluation prior to determination. As a result, this is still, however, these are not currently covered by the WSI's. It is anticipated that these will be added into the approved document as an addendum.</p> <p>The WSI's currently produced are for the pre-submission archaeological evaluation only. These do not cover any post-consent archaeological evaluation or mitigation. Under discussion with NG.</p>	
3.6.2147	<p>Site specific Written Schemes of Investigation (WSIs) for pre-consent priority archaeological trial trenching. Draft Mitigation Strategy and Outline WSI</p>	<p>The scope contents of the Draft Mitigation Strategy and methodology of WSIs for archaeological trial trenching. Outline WSI is considered appropriate and proportionate to the level of evaluation required. impact anticipated.</p> <p>National Grid issued the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project in April 2025.</p> <p>Updated Position (February 2026): The priority Trial Trenching is complete in SCC and therefore there are no further Site</p>	<p>SCCAS – The pre-consent archaeological evaluation is ongoing; we have not yet been sent WSI of all areas for pre-consent archaeological evaluation. As a result, this is still SCC comments received on the 20th May 2025.</p> <p>SCC Archaeology – We have not been sent the Draft Mitigation Strategy and Outline WSI for review.</p> <p>SCCAS have repeatedly asked to see early drafts of these document to assist in the delivery timescales of these documents.</p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>Specific WSI's to be produced for that phase of evaluation. SCC have approved all of the SS WSI's for the priority trial trenching in the county. SCC comments are noted, and NG will continue to engage with SCC on this matter.</p>	<p>It is highly recommended that these documents are sent to us for review to allow any amendments to be made prior to their submission for examination. <u>Under discussion with NG.</u></p> <p>The draft AMS-OWSI was substantially incomplete when it was submitted for review and comment in April 2025. Therefore, SCCAS were unable to comment fully on this document, and we were not provided an amended version of the AMS-OWSI prior to submission.</p>	
<u>3.6.22</u>	<p><u>Outline Archaeological Mitigation Strategy and Outline WSI.</u></p>	<p>The contents of the Outline Archaeological Mitigation Strategy and Outline WSI (AMS-OWSI) is considered appropriate and proportionate to the level of evaluation required.</p> <p>National Grid issued the Outline AMS-OWSI for the post-consent stage of the project in April 2025.</p>	<p>SCCAS has reviewed the submitted AMS-OWSI and find that it does not establish sufficiently rigorous measures to secure a programme of archaeological evaluation and mitigation in the interests of the historic environment. Consequently, the current dDCO requirement (relying on the AMS-OWSI in its present form) fails to provide adequate protection for heritage assets and the AMS-OWSI must be revised in line with SCCAS comments, which will be supplied to NG.</p> <p>The draft AMS-OWSI was substantially incomplete when it was submitted for review and comment in April 2025. Therefore, SCCAS were unable to comment fully on this document, and we were not provided an amended version of the AMS-OWSI prior to submission.</p>	<p><u>Under discussion</u></p>

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
3.6.2348	Programme for completion of archaeological fieldwork	<p><u>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.</u></p> <p><u>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 complete 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'.</u></p> <p><u>The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required. impact anticipated.</u></p> <p><u>May 2025, technical focus meeting to discuss ongoing archaeology work on site.</u></p>	<p><u>SCCAS have asked for a plan showing the areas where archaeological evaluation, geophysical survey, trial trenching, geoarchaeological assessment and palaeoenvironmental assessment has been undertaken to date and areas where these required works are still outstanding. This has not yet been supplied. Without this the summary is incomplete and fails to provide sufficient information.</u></p> <p><u>The provided summary only outlines the priority areas and does not address all areas SCC position pending sight of project impact.</u></p> <p><u>SCCAS believes the use of the term "contingency" evaluation is inappropriate for areas where evaluation is not completed prior to determination. Any areas of the project where archaeological evaluation is not completed prior to determination, must then be included in the full programme of post-consent archaeological evaluation in order to inform an appropriate mitigation strategy.</u></p>	Under discussion
3.6.24	<u>Supplementary Environmental Information</u>	<p><u>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.</u></p> <p><u>Given the comments provided it is understood that SCC are in agreement with the part of the note that sets out the approach to</u></p>	<p><u>As above, we are still waiting for the plan SCCAS requested and are unhappy with the use of the term "contingency".</u></p> <p><u>With regards to 3rd party infrastructure, the undergrounding of the 132kV sections would be required as facilitating works for the NSIP and therefore could represent a constraint on the delivery of the overall project. SCCAS have expressed the need for this aspect of</u></p>	<u>Under Discussion</u>

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<u>supplementary information that will be provided for the DCO examination.</u>	<u>work to be undertaken at the earliest opportunity.</u> Furthermore, the archaeological fieldwork summary should also include provision of <u>geoarchaeological and palaeoenvironmental assessment, which is currently outstanding and must be completed to inform appropriate mitigation strategies and the technical designs for river crossings.</u> <u>We now recognise that substantial aspects of this evaluation are unlikely to be achieved prior to determination, however, full evaluation should be undertaken at the earliest opportunity (should permission be granted) to allow appropriate mitigation to be delivered within project timescales.</u>	

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	Suffolk 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) [APP-126] and Section 9.2 of Chapter 12	<u>SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025:</u> <u>Action on project team to check legislation and policy documents referenced are correct. Include updates in any errata</u>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>(Hydrology, Land Drainage and Flood Risk) of the ES [APP-221].</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p>National Grid provided the following comments in response to the query raised on 21 October 2025:</p> <p>Since the October meeting, legislation and policy document references have been reviewed. Minor updates, in particular adding reference to the National Standards for SuDS, and updates to cover cross references to the most recent publications of the National Planning Policy Framework and National Policy Statement EN-1, have been logged in the errata document, which will be issued in February 2026.</p>	<p><u>documents and provide an update to SCC, SCC position pending sight of the ES</u></p>	

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	<p>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 [APP-221].</p>	<p><u>SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025:</u></p> <p><u>Project team to check when Suffolk data was requested with relation to historic flood events. If gap is found a technical note can</u></p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>National Grid provided the following comments in response to the query raised on 21 October 2025:</u></p> <p><u>Additional historical flooding information has been collected and reviewed. This is reported in a technical note which will be shared with SCC and submitted to the examination at Deadline 2.</u></p>	<p><u>be appended to the SoCG to cover this off. SCC position pending sight of the ES</u></p>	
3.7.4	Assessment methodology	<p>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 and through subsequent thematic group meetings and technical notes.</p> <p>Technical notes for the following under consideration:</p> <p>Works In, Over and Under Watercourses</p> <p>Surface Water Management Principles</p> <p>SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</p>	<p>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 and through subsequent thematic group meetings and technical notes.</p> <p>Technical notes for the following under consideration:</p> <p>Works In, Over and Under Watercourses</p> <p>Surface Water Management Principles</p> <p>Comments received from SCC on the technical notes.</p> <p><u>SCC confirmed this is agreed following meeting discussing the Statement of Common Ground on 4 November 2025.</u></p>	<p>Under discussion Agreed</p>
3.7.5	Key parameters and assumptions	<p><u>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 [APP-221].</u> The key parameters and</p>	<p><u>SCC confirmed this matter is still SCC position pending sight of the ES</u> <u>Under discussion with the LLFA following their review of the Statement of Common Ground on 21st October 2025.</u></p>	<p>Under discussion</p>

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		assumptions presented are considered appropriate. <u>Updated Position (February 2026):</u> <u>The Applicant awaits further correspondence, and National Grid will continue to engage with SCC on this matter.</u>		
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 [APP-221] . The baseline conditions and receptors presented are considered appropriate.	SCC <u>agrees, following position pending</u> sight of the ES.	<u>Under discussion</u> <u>Agreed</u>
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 [APP-221] . Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	SCC <u>agrees, following position pending</u> sight of the ES.	<u>Under discussion</u> <u>Agreed</u>
3.7.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in	SCC <u>agrees, following position pending</u> sight of the ES.	<u>Under discussion</u> <u>Agreed</u>

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		Section 12.6 of Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES [APP-221] 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.		
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 [APP-221]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	SCC agrees, following position pending sight of the ES.	Under discussion Agreed

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 [APP-221]. The assessment of effects during construction presented is considered appropriate. <u>Updated Position (February 2026): The Applicant awaits further correspondence, and National Grid will continue to engage with SCC on this matter.</u>	<u>SCC confirmed this matter is still SGC position pending sight of the ES Under discussion following their review of the Statement of Common Ground on 21 October 2025. Further internal discussion is required before matter can be moved forward.</u>	Under discussion
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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
3.7.11	Operational (and maintenance) effects	<p>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 [APP-221]. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p><u>Updated Position (February 2026): The Applicant awaits further correspondence, and National Grid will continue to engage with SCC on this matter.</u></p>	<p><u>SCC confirmed this matter is still SCC position pending sight of the ES. Under discussion following their review of the Statement of Common Ground on 21 October 2025. Further internal discussion is required before matter can be moved forward.</u></p>	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 [APP-300] includes all relevant construction mitigation measures specified in Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES [APP-221] 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 [APP-300].</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP [APP-300].</p> <p>A further iteration of the Outline CoCP [APP-300] was issued in May 2025 following the meeting and feedback in writing.</p>	<p><u>Suffolk Joint Emergency Planning Unit provided comments on 6 November 2025.</u></p> <p>SCC confirmed this matter is <u>position pending sight of the ES.</u> Still under discussion <u>following their review of the Statement of Common Ground on 21 October 2025.</u></p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<u>Updated Position (February 2026): The Applicant awaits further correspondence, and National Grid will continue to engage with SCC on this matter.</u>		
Other matters as required				
3.7.13	Flood Risk Assessment (FRA)	<p>The draft FRA [APP-331] was issued to stakeholders in January and March 2025.</p> <p>The scope, methodology, assessment and conclusions drawn in the FRA [APP-331] are considered appropriate and proportionate.</p> <p>Comments received will be taken on board for the next iteration of this document.</p> <p><u>National Grid provided the following comments in response to the query raised on 21 October 2025:</u></p> <p><u>Since the October meeting, additional historical flooding information has been collected and reviewed. This is reported in a technical note which will be shared with SCC and submitted to the examination.</u></p>	<p>Comments were issued by SCC on the 22nd January 2025 relating to foul water flooding and updated national flood maps.</p> <p><u>SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025:</u></p> <p><u>Project team to do a sense check and let the Council know regarding the historic mapping. This can then be mapped up as a shapefile. SCC would like to see an updated FRA to ensure historic flood events are covered off.</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	Suffolk 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) [APP-126] and Section 13.2 Chapter 13 (Landscape and Visual) of the ES [APP-226].</p> <p>Updated Position (February 2026): All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p>The duty to 'seek to further the purposes' under Section 85 of the Countryside and Rights of Way Act 2000 is referenced in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. Further detail is provided in 5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120].</p> <p>National Grid note the comments made by SCC and will continue to engage on this matter.</p>	<p>The new duty under Section 85 SCC is satisfied that the special qualities of the Countryside and Rights of Way Act 2000 is not mentioned in the main Chapter 13 of AONB have been suitably addressed by the ES [APP-226]. Applicant but is acknowledged in Appendix 13.5 National Landscape Assessment Study [APP-235] and dealt with in detail in document 5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) (Final Issue A) [APP-120].</p> <p>SCC defers to the <u>National Landscape Partnership and Natural England (on this matter as the government's statutory advisor)</u> on this matter.</p> <p>SCC supports the National Landscape in their section 85 "furthering the purposes" measures proposal.</p> <p>SCC confirmed in meeting regarding the Statement of Common Ground on 27 January 2026 that this requires further review.</p>	Agreed Under discussion
EIA – Approach and Methods				
3.8.2	Study area	<p>The study area for assessing Landscape and Visual was agreed through the EIA Scoping Report and the Scoping Opinion received from the Planning Inspectorate and through subsequent thematic workshops.</p>	<p>SCC (Landscape) broadly agrees with the <u>Applicant's rationale for the LVIA study area presented in Table 13.2 (ES Chapter 13, Landscape and Visual).</u></p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>A 2 km buffer was applied to the 132kV overhead line removal and this is absorbed within the 3 km LVIA Study Area buffer from the proposed 400kV overhead line and underground cable. For the purposes of the assessment a single 3 km Study Area was presented.</u></p> <p>The rationale for the LVIA Study Area is summarised in Table 13.2 in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].</p> <p>Updated Position (February 2026): SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</p>	<p><u>SCC is concerned that any works to the 132kV network have not been given their own study area in Figure 13.7 but sit within the study area for the scheme, meaning the route alignment of the proposed 400kV line is the centre of the study area throughout. SCC considers that the 132vV works need to be treated as part of the scheme for the purpose of establishing the study area. This would have increased the study area slightly in the relevant areas.</u></p> <p><u>SCC confirmed in meeting regarding the Statement of Common Ground on 27 January 2026 that this requires further review. The minutes of the meeting held on the 25 September 2024 state that the Study Area for the underground cable has been extended to 3km (from 1km within the PEIR) in light of feedback received at statutory consultation and that a Study Area for the third party works had also been incorporated. This is not evident in Figure 1, Landscape and Visual Impact Assessment Proposed Viewpoints, Rev. B, dated October 2024. SCC (Landscape) welcomes that visual receptors at a distance of up to 5km from the project will be considered, where there is the potential for significant visual effects to arise beyond the 3 km study area (PEIR, paragraph 13.5.5).</u></p>	
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</p>	<p>SCC (Landscape) <u>welcomes</u> considers that for the ES the 'Valued Landscape Assessment, Waveney Valley', dated April</p>	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>(Landscape and Visual) of the ES [APP-226].</p> <p><u>See response under 3.8.4 below in relation to the Waveney Valley Valued Landscape Assessment.</u></p> <p><u>Updated Position (February 2026):</u> SCC comments are noted, and <u>National Grid</u> will continue to engage with SCC on this matter.</p>	<p>2024, has been should be included in the baseline data <u>sources</u> and <u>bibliography</u>. <u>However, no further reference or acknowledgement to this document seems to have been made</u> considered in the LVIA. <u>The findings have not been reflected upon.</u> <u>Therefore, there is no evidence that the Waveney Valley Valued Landscape Assessment has informed or influenced the LVIA.</u> the assessment of landscape and visual effects on this sensitive landscape resulting from the construction of an overhead powerline <u>in ES Chapter 13 remains high-level and does not sufficiently convey the adverse impacts and effects of the scheme.</u></p> <p><u>SCC confirmed in meeting regarding the Statement of Common Ground on 27 January 2026 that this requires further review.</u> <u>Further, detailed tree and hedgerow surveys (in accordance with the up-to-date version of BS 5837 and the 1997 Hedgerow Regulations) need to be provided to inform the Vegetation Retention and Removal Plan.</u></p>	
3.8.4	<p>Assessment methodology (including LVIA methodology and viewpoints)</p>	<p>The outline methodology for assessing Landscape and Visual was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p> <p>Meetings were held in September 2024 to seek to agree the detailed methodology as well as the number and location of viewpoints. In March 2025 National Grid issued an update on the LVIA Viewpoints and Methodology.</p>	<p>Email from SCC dated 5th Nov <u>2024</u> – Landscape consultants have not assessed the approach to rationalisation of the 132kV network.</p> <p>No agreement was reached in the meeting held on the 25 September 2024, with regards to the necessity of a Valued Landscape Assessment for the study area. (Local authority representatives were in favour).</p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>Updated Position (February 2026):</u> An assessment SCC requested the inclusion of landscape value is provided in Annex A of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. <u>Waveney Valley</u> Valued Landscape Assessment <u>The Waveney Valley Valued Landscape Assessment (Alison Farmer, 2024)</u> <u>(specifically Evaluation Areas EA1 and EA2)</u> <u>was one of the sources which informed -</u> National Grid propose to consider valued landscape qualities in the LVIA baseline. Although the study was but do not quoted directly, below are some examples of key propose to undertake a separate valued <u>landscape characteristics and sensitivities identified in both the Alison Farmer study and the LVIA, within the 3 km LVIA Study Area (noting that EA1 and EA2 are larger areas which extend beyond the LVIA Study Area).</u> <u>These were taken from the assessment of landscape value for LCA A5 Waveney Rural River Valley which is in pages A13 and A14 of Annex A of Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] EN020027-000373-6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment.pdf</u></p> <ul style="list-style-type: none"> • <u>Natural Heritage – references to 'woodland and coastal and floodplain</u> 	<p><u>SCC considered that</u> The proposal by National Grid to consider valued landscape qualities in the LVIA, may be sufficient, provided that this is based on the actual local landscape character areas the scheme would affect, rather than the landscape character types on which the identification of character areas would be based on and defined against. <u>This has not been taken on board by the Applicant.</u></p>	

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>grazing marsh' and Roydon Fen being a 'spring-fed fen with deep peat soil'</u></p> <ul style="list-style-type: none"> • <u>Cultural Heritage – reference to 'Grade I listed Churches' and 'utilising reeds, sedge, furze, hemp and flax in cottage industries'</u> • <u>Landscape Condition – reference to 'condition of the landscape is mixed due to settlement expansion and infrastructure' and 'The wetlands on the valley floor form remnants of a much more extensive area'</u> • <u>Associations – reference to 'Richard Mabeys book Nature Cure'</u> • <u>Recreational – reference to PRoW, Common Land / Open Access Land and 'walking trails along boardwalks'</u> • <u>Perceptual (scenic) – reference to 'The River Waveney itself has little visual influence'</u> • <u>Perceptual (Wildness and tranquillity) – reference to the landscape being 'peaceful and tranquil', and tranquillity being reduced 'along main roads'</u> <p><u>Functional – reference to the area being 'important for carbon sequestration, an important carbon sink and for floodwater storage' assessment.</u></p>		
3.8.5	<p><u>Assessment methodology (Viewpoints)</u></p>	<p><u>Updated Position (February 2026):</u> <u>Viewpoints beyond the 3 km Study Area</u> <u>The following viewpoints are located within Suffolk and are beyond 3 km from the nearest</u></p>	<p><u>SCC notes that, within Suffolk, there appear to be only two viewpoints outside the 3km study area (VP3.20 and VP3.29) and that none were considered at the greater distance of up to 5 km from the scheme. SCC</u></p>	<p><u>Under discussion</u></p>

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>above ground structure (approximate distance provided in brackets):</u></p> <ul style="list-style-type: none"> • <u>Viewpoint 3.20 Fenbridge Lane (4.2km) – see PDF page 132 to 134 of APP-230 nsip- documents.planninginspectorate.gov.uk/p ublished-documents/EN020027-000375- 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2.pdf</u> • <u>Viewpoint 3.24 Higham Hill, south of Lower Raydon (4.2km) – see PDF pages 144 to 146 of APP-230 nsip- documents.planninginspectorate.gov.uk/p ublished-documents/EN020027-000375- 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2.pdf</u> • <u>Viewpoint 3.26 Essex Way, near Langham Hall (3.7km) – see PDF pages 149 to 150 of APP-230 nsip- documents.planninginspectorate.gov.uk/p ublished-documents/EN020027-000375- 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2.pdf</u> • <u>Viewpoint 3.27 B1066 Park Road, near Thorington Street (4.8km) – see PDF pages 151 to 153 of APP-230 nsip- documents.planninginspectorate.gov.uk/p ublished-documents/EN020027-000375- 6.13.A3 Environmental Statement</u> 	<p><u>considers that there is potential for significant visual effects beyond the 3 km study area, for example where there are particularly sensitive visual receptors, for example within the National Landscape, and where topography allows more far-reaching views.</u></p>	

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3.8.65	Key parameters and assumptions	<p>Appendix 13.3 - Visual Baseline and Assessment - Part 2.pdf</p> <p>No significant effects were identified at these viewpoints as set out in ES Appendix 13.3: Visual Baseline and Assessment Part 2 of 4 APP-230 nsip-documents.planninginspectorate.gov.uk/publicshed-documents/EN020027-000375-6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2.pdf</p> <p>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 [APP-226]. The key parameters and assumptions presented are considered appropriate.</p> <p><u>Updated Position (February 2026):</u> <u>Commitments relating to vegetation reinstatement and the 3:1 tree replacement ratio for individual trees and small groups are detailed in 7.4 Outline Landscape and Ecological Management Plan [AS-046].</u> <u>SCC comments are noted, and NG will continue to engage with SCC on this matter.</u></p>	<p>SCC (Landscape) considers that the Key parameters for assessment and assumptions as summarised in Section 13.45 of Chapter 13 (Landscape and Visual) of the PEIR are high level. The initial focus on landscape and visual receptors which would potentially experience significant effects (paragraph 13.4.20 of the ES [APP 226] broadly is acceptable, provided that in due course (i.e. in the ES) all landscape and visual effects (including non-significant ones) are assessed and communicated.</p> <p><u>SCC welcomes the commitment by the Applicant</u> The assumption that vegetation removed during construction would be reinstated <u>(a fundamental pre-requisite to achieving BNG),</u> except where there are planting restrictions associated with requirements to maintain an overhead line safety clearance. SCC further welcomes the commitment and over underground cables, is welcome, but it is considered that vegetation (for example, trees) that cannot be replaced</p>	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
			<p>in certain areas will be replaced elsewhere (SCC requests that is carried out as near to the place of removal as possible). SCC welcomes the Applicant's commitment to replace individual trees and trees within groups at ain the scheme. The standard ratio of is 3 replacement new trees for each mature tree lost.</p>	

EIA – Baseline Conditions

3.8.76	Baseline conditions and receptors	<p>The baseline conditions and receptors for Landscape and Visual are presented in Section 13.5 of Chapter 13 (Landscape and Visual) of the ES [APP-226]. The baseline conditions and receptors presented are considered appropriate.</p> <p><u>Updated Position (February 2026):</u> Sensitivity of Road Users The sensitivity of visual receptors is set out in paragraphs 13.4.49 to 13.4.56 of Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227] EN020027-000372-6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology.pdf</p> <ul style="list-style-type: none"> • <u>People travelling in vehicles on scenic routes and tourist routes, where attention is focused on the surrounding landscape, but is transitory are of medium susceptibility</u> • <u>People travelling more rapidly on more major roads, rail or transport routes (not</u> 	<p>SCC disagrees.</p> <p>For Suffolk, the Landscape Baseline and Assessment [APP-228] is based on landscape character types rather than defined geographical areas within these types.</p> <p>SCC (Landscape) considers that the accuracy of the landscape assessment suffers as a result, in particular where the same landscape type appears in different locations (for example LCT: Rolling Valley Farmlands and Furze, LCT: Ancient Plateau Claylands). The descriptions of the changes in the landscape remain vague (e.g. paragraph 13.3.231: '...including the losses of some hedges and hedgerow trees...') The effects that the scheme will have on the local landscape character of the varying areas do not appear to be discussed. SCC (Landscape) does not fully agree with grouping of key visual Receptors and Visual Receptor Areas.</p>	Not Agreed Under Discussion
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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>recognised as scenic routes) are of low susceptibility</u></p> <p>People at Work</p> <p>Paragraph 13.2.38 of Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229] states that <i>'People at work are generally held to be of lower sensitivity to changes in their view and are not considered further in this assessment.'</i> The assessment of effects on visual receptors within VRAs and at viewpoints focuses on the most sensitive receptors (i.e. residential or recreational receptors), although people at work within the study area would experience views of a similar nature to those described in the LVIA. Further discussion will take place following review of the information within the LIR. SCC comments are noted, and NG will continue to engage with SCC on this matter.</p>	<p>There does not appear to be an assessment of the actual local landscape areas and their character and how they reflect the landscape character types they are nested in.</p> <p>SCC (Landscape) finds it difficult to follow the grouping of visual receptors into Visual Receptor Areas.</p> <p>Road users on recognised tourist routes should not be in the same category as other road users <u>(although there appears to be some differentiation within the area assessments, which is welcome).</u> and it is not acceptable that visual receptors at places of work are being scoped out of further assessment. While their focus is not primarily on the natural environment, they have little choice as to how much time they spend in the vicinity of the project and should also be considered for the perceptual aspects of the scheme.</p> <p><u>SCC notes that the visual receptors at their place of work have now been included (paragraph 13.2.36) [APP- 229]. However, no further reference appears to have been made in the VRA assessments, they are not even considered in the recurring heading: <i>Community, Recreation and Road Users Within the VRA</i>. It appears that there is no figure to illustrate the extent of the Visual Receptor Areas.</u></p> <p><u>SCC (landscape) will comment in detail in the LIR, but considers at this stage that the baseline assessments are insufficient.</u> Landscape Character Areas and</p>	

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
			Visual Receptor Areas will need to be identified on appropriately scaled maps.	
EIA – Embedded, Standard and Additional Mitigation Measures				
3.8.87	Embedded mitigation	<p>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 [APP-226]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><u>Updated Position (February 2026): SCC comments are noted and National Grid will continue to engage with SCC on this matter.</u></p>	<p>Adequacy of undergrounding, mitigation and lack of compensation are all still under discussion.</p> <p><u>SCC also notes that the majority of change requests have not been adopted or considered.</u></p>	<u>Not agreed</u> <u>Under discussion</u>
3.8.98	Standard mitigation	<p>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 [APP-226] and set out in the Outline CoCP [APP-300 document reference 7.2]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><u>Updated Position (February 2026): Further discussion will take place following review of the information within the LIR. SCC comments are noted, and NG will continue to engage with SCC on this matter.</u></p>	<p><u>SCC will provide detailed</u>Please see comments on <u>the Outline CoCP [APP-300, APP-301]oCoCP in the LIR</u> separate document, dated 14/03/2025.</p> <p><u>Standard mitigation measures as described at paragraph 13.6.5 of Chapter 13 [APP-226] does not refer to landscape and visual mitigation, but to management activities and techniques employed during construction. While these measures are welcome, the current proposals do not address the substantial significant negative residual impacts/effects in landscape and visual terms. Standard mitigation measures during construction remain under discussion.</u></p>	<u>Not agreed</u> <u>Under discussion</u>

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
3.8.109	Additional mitigation	<p>The three categories <u>consideration of mitigation (embedded, standard and additional)</u> are defined in 6.5 Environmental Statement Chapter 5: EIA Approach and Method [APP-135]. Additional mitigation is defined as <u>'mitigation over and above embedded and standard mitigation measures to reduce environmental effects...'</u>.</p> <p>Mitigation measures <u>are presented in Section 13.6</u> of relevance to landscape and visual effects are summarised in 6.13 Environmental Statement Chapter 13 - <u>(Landscape and Visual [APP-226].</u> Planting within Environmental Areas around substations and CSE compounds is <u>) of the ES. Additional mitigation is considered to be embedded mitigation, appropriate and adequate, in terms of its nature and scale, to address potential effects.</u></p> <p>SCC comments are noted, and NG will continue to engage with SCC on this matter.</p>	<p>SCC (Landscape) disagrees with the term 'additional', and also with the definition that these are measures that go 'above and beyond'. (PEIR, paragraph 13.67.8, <u>ES Chapter 13 [APP-,226]).</u></p> <p>None of the mentioned forms of mitigation refer to mitigative planting to reduce the visual and landscape effects, separate from reinstatement planting, planting around CSE compounds and BNG requirements. <u>SCC considers that such planting must be considered in its own right.</u></p>	Under discussion Not agreed
3.8.114	Compensation	<p>Paragraph 7.2.41 of the <u>5.6 Planning Statement [APP-085]</u> and Section 9.7 of the <u>7.4 Outline Landscape and Ecological Management Plan [AS-046]</u> set out the Applicant's position on landscape compensation. The <u>7.4 Outline Landscape and Ecological Management Plan [AS-046]</u> confirms off-site provision for tree replacement may be required; where this is the case, this is considered to be compensation. Landscape compensation measures are considered in relation to the</p>	<p>Compensation has not been addressed in the PEIR and Applicant <u>proposed</u> proposes to deal with this separately as part of the DCO process. (PEIR, para. 15.5.14)</p> <p><u>SCC welcomes the commitment by the Applicant to replace individual trees and trees within groups at a ratio of 3:1 (Table 13.1 [APP-226]) and acknowledges the probability that not all of these trees can be planted within the DCO limits. It must be remembered, however, that these trees are fundamentally compensatory replacement</u></p>	Under Discussion Not agreed

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		<p><u>mitigation hierarchy but there is no requirement under policy to compensate for all residual effects. The residual effects that remain following the application of the mitigation hierarchy and any compensation provided then falls to the planning balance. The consideration of compensation measures is ongoing, including discussions with relevant stakeholders.</u></p>	<p><u>planting. On their own, these trees will not be capable to offset the residual harm to landscape character and visual amenity resulting from this project. Any such off-set would be incidental.</u></p> <p><u>SCC considers that a Landscape Enhancement Scheme, comparable to those for National Parks and National Landscapes under the Visual Impact Provision (VIP) funded by Ofgem, is required to partially compensate for the construction, operation and maintenance impacts on landscape and visual amenity resulting from this project.</u></p> <p><u>SCC supports BSMDC in their statement: "Where undergrounding isn't proposed, explanation is needed as to why compensation isn't being offered instead, except at substations and sealing end compounds, when the PEIR states that significant landscape and visual impacts will occur along the length of the project."</u></p>	

EIA – Assessment Conclusions

3.8.1240	Construction effects	<p><u>The assessment of effects during construction is presented in Section 13.7 of Chapter 13 (Landscape and Visual) of the ES [APP-226]. The assessment of effects during construction presented is considered appropriate.</u></p> <p><u>Updated Position (February 2026):</u></p> <p><u>The value assessed for all heritage assets follows the methodology set out in ES Chapter 11 Historic Environment [APP-</u></p>	<p><u>SCC welcomes the information provided within the Arboricultural Impact Assessment [APP-236], the Hedgerows Regulations Report [APP-161] and the Trees and Hedgerows to be Removed and or Managed Plans [ApPP- 048- APP-055] and will provide detailed comments on these in the LIR.</u></p> <p><u>SCC (Landscape) considers that the assessment of effects on landscape character and visual amenity in the LVIA</u></p>	Under discussion
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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>208]. Assessments of value are described in Appendix 11.1 Historic Environment Baseline Report [APP-209], which contains baseline descriptions and setting assessment. Commitment GG26 in the Outline Code of Construction Practice [APP-300] states that construction lighting of the lowest luminosity to safely perform each task and include motion sensors to be switched off when not in use where it is safe and efficient to do so. Permanent lighting (where required) will be designed, positioned, and directed to reduce the intrusion into adjacent properties, protected species and habitats. Task-specific lighting will be directed to reduce intrusion so far as is reasonably practicable, and considered be all necessary specialists. Further discussion will take place following review of the information within the LIR.</u></p>	<p><u>[APP-226] fails to adequately recognise the project's impacts on the landscape and visual receptors. This is illustrated, to give one example, in the assessment provided for Mellis Common, the significance of which is not recognised in the LVIA. In the Historic Environment Baseline Report [APP-209] it is not clear how the medium value given to the conservation area is arrived at. SCC considers that lighting must be kept to a minimum, and that wildlife and residential amenity must be protected. The chosen luminaires should be of the warmest tone (i.e. the lowest Kelvin level) achieving the required illumination.</u></p> <p><u>While accepting the rationale behind the potential necessity for night-time working, SCC considers that detailed justifications and programmes need to be provided for each location at detailed design stage and that nighttime working must be kept to an absolute minimum.</u></p> <p><u>Please also see my earlier comments with regards to the landscape visual baselines. Further comments to follow in the LIR, SCC E-mail 4th Nov 2024—Landscape—consultants not assessing tree and hedgerow loss along the route.</u></p> <p><u>The assessment of effects is thus far preliminary. Vegetation losses (hedgerows, trees, woodland) need to be quantified, ideally for each LCA.</u></p>	

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
3.8.1344	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 13.7 of Chapter 13 (Landscape and Visual) of the ES [APP-226]. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p>Updated Position (February 2026): <u>SCC comments are noted and National Grid will continue to engage with SCC on this matter.</u></p>	<p>The assessment of effects is thus far preliminary.</p> <p><u>SCC (Landscape) considers that the assessment of effects could be compromised by the inadequacies of the baseline presentation and will provide detailed comments in the LIR.</u></p> <p><u>The sole focus of the LVIA on landscape and visual receptors which would potentially experience significant effects does not account for the fact that an accumulation of non-significant effects can in itself be significant. The landscape and visual adverse effects resulting from the scheme do not fall away below the significance threshold, they are just adverse to a lesser degree.</u></p> <p><u>SCC confirmed in a meeting to discuss the Statement of Common Ground on 27th January 2026 that this matter is still under discussion.</u></p>	Under discussion
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.8.1442	Outline CoCP	<p>The Outline CoCP [APP-300] includes all relevant construction related mitigation measures specified in Chapter 13 (Landscape and Visual) of the ES [APP-226] 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 [APP-300].</p>	<p>Please see comments on oCoCP in separate document, dated 14/03/2025.</p> <p><u>The draft oCoCP, May 2025 does not reflect many of the comments made previously by SCC (Landscape). It therefore remains under discussion. Detailed comments have been provided by SCC on 03/06/2025 and will be revised for the LIR.</u></p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP [APP-300].-</p> <p>A further iteration of the Outline CoCP [APP-300] was issued in May 2025 following the meeting and feedback in writing.</p> <p>Updated Position (February 2026): Further discussion will take place following review of the information within the LIR, SCC comments are noted, and NG will continue to engage with SCC on this matter.</p>		
3.8.1543	Outline LEMP	<p>The Outline LEMP [AS-046] includes all relevant operational related mitigation measures specified in Chapter 13 (Landscape and Visual) of the ES [APP-226] and is appropriate.</p> <p>Meetings held in October 2024 to agree on the structure for the Outline LEMP [AS-046].-</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline LEMP [AS-046].-</p> <p>A further iteration of the Outline LEMP [AS-046] was issued in May 2025 following the meeting and feedback in writing.</p> <p>Updated Position (February 2026): Refer to 3.8.9 for National Grid's Position on additional landscape mitigation. Refer to 3.8.10 for National Grid's Position on landscape compensation. Any loss of hedgerow (including any important hedgerows) would be mitigated with replacement planting on completion of</p>	<p>Please see comments on oLEMP in separate document, dated 20/02/2025.</p> <p>SCC welcomes the amendments that have been made to the draft OLEMP, May 2025. However, there remain considerable issues, such as (but not limited to) the proposed provision of compensation for landscape and visual matters; the provisions for important hedgerows; the level of tree protection during construction; temporary traffic management during construction to minimise vegetation losses; landscape and visual mitigation outside the 'Environmental Areas' around CSE compounds and substations; the landform design within the Environmental Areas, Aftercare. Detailed comments have been provided by SCC on 03/06/2025.</p> <p>Further comments on the submission version of the oLEMP will be provided in the LIR.</p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>construction as set out under Section 7.6 of 7.4 Outline Landscape and Ecological Management Plan [AS-046].</u></p> <p><u>Tree protection measures are set out in Section 7.3 of 7.4 Outline Landscape and Ecological Management Plan [AS-046].</u></p> <p><u>Aftercare is set out in Section 10 of 7.4 Outline Landscape and Ecological Management Plan [AS-046].</u></p> <p><u>Landscape proposals within Environmental Areas are indicative and will be finalised at the detailed design stage of the Project.</u></p> <p><u>Further discussion will take place following review of the information within the LIR. Comments will be taken on board for the next iteration of this document.</u></p>		

Other matters as required

3.8.16	<p><u>Landscape at Bramford Substation</u></p>	<p><u>Updated Position (February 2026):</u></p> <p><u>At Bramford Substation the Project includes a relatively small extension to the south-west corner together with overhead lines connecting into the north and the south. The Applicant is required to assess the potential environmental impacts of the Project only and set out proposed mitigation, in an Environmental Statement (ES) in accordance with the Infrastructure Planning Environmental Impact Assessment (EIA) Regulations 2017. The EIA started early in the process, and in that respect, a considerable amount of assessment work was undertaken to allow preliminary</u></p>	<p><u>SCC considers that not to provide an Environmental Area / landscape-scale landscape and visual mitigation proposals around Bramford substation would only be acceptable, if there was a coordinated Landscape Master Plan for the wider Bramford substation area in cooperation with other projects in the area.</u></p>	<p><u>Under discussion</u></p>
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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>judgements to be made about the design and routeing of the Project. This is set out in a number of documents including 5.1 Consultation Report [APP-066] and 5.15 Design Development Report [APP-122], with feedback helping shape the Project. <u>Embedded landscape and visual mitigation measures in the vicinity of Bramford Substation include proposals for rationalisation and undergrounding of several sections of existing 132 kV overhead line together with careful consideration of the routeing of the proposed 132kV underground cables and 400 kV overhead line into and out of the substation.</u></u></p> <p><u>The Applicant recognises people may have concerns about the cumulative effects arising from overlapping Nationally Significant Infrastructure Projects and other schemes in the local area. An assessment of Cumulative Effects has been undertaken in accordance with 6.19 Scoping Report [APP-288 - 296] and 6.20 Scoping Opinion [APP-297] and is presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. This includes an assessment of cumulative landscape and visual effects around Bramford Substation including the Bramford to Twinstead Project. Significant cumulative landscape and visual effects are recognised.</u></p>		

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	Suffolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.9.1	Policy and legislation	<p>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) [APP-126] and Section 15.2 of Chapter 15 (Socio-economics, Recreation and Tourism) of the ES [APP-265].</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p>SCC comments are noted.</p> <p>Updated Position (February 2026): <u>In consideration of the new Socio-economic Effects of NSIPs Supplementary Guidance Document developed by SCC, the ES chapter has identified the direct impact (i.e. construction workforce) and indirect impact (i.e. supply chain) – however, material supply and demand would vary significantly, and it is not possible to specify sources at the time of submission of the DCO application as stated in Paragraph 15.7.7. of the Chapter 15 (Socio-economics,</u></p>	<p>SCC acknowledge the identification and consideration of relevant legislation, policy, and guidance within Chapter 2 and Section 15.2 of the ES. SCC expects ongoing review to reflect any updates in national or local policy and seeks assurances that the policy framework aligns with best practices.</p> <p>SCC recommends a review of our new Energy and Climate Adaptive Infrastructure Policy Supplementary Guidance Document: Skills, workforce and supply chain assessment and mitigation of adverse impacts and maximisation of opportunities.</p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>Recreation and Tourism) of the ES [APP-265]</u> during construction. Operational impacts have been scoped out in accordance with the <u>Scoping Report [APP-288 to APP-296]</u> and <u>Scoping Opinion [APP-297]</u>. National Grid will work constructively with Local Authorities and local partners to understand priorities relating to skills and employment and to support, where appropriate, initiatives that leave a positive legacy for communities. These activities will be progressed through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with established guidance.</p> <p>The matrix presented in <u>Chapter 15 (Socio-economics, Recreation and Tourism) of the ES [APP-265]</u> comprises five levels of effect significance: High, Medium, Low, Very Low and No change. This contrasts with the three levels of High, Medium and Low, outlined in the SPD. The use of the five-level matrix in the ES enables a more nuanced assessment of potential impacts on the local economy and local employment. However, this methodological difference does not materially alter the overall conclusions of the assessment, and NG will continue to engage with</p>		

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		SCC on this matter.		

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”. A meeting was held on 12 September 2024 to seek to agree this point in the Scoping Opinion.</p> <p><u>National Grid provided the following comments in response to the query raised:</u></p> <ul style="list-style-type: none"> <u>The scale of construction employment arising from the Project is modest, with a maximum peak local construction workforce of approximately 172 Full Time Equivalent roles and an overall local job demand of approximately 480 roles over the four year construction period. Given this, as well as the limited scope for local employment, the differentiation of study area</u> 	<p>During the Thematic Group Meeting (August 2023), SCC requested further expansion to the study area proposed to capture potential employment in the wider cities, towns, and settlements as a result of the Project. It is proposed by National Grid that West Suffolk, Norwich City Council and Ipswich Borough Council will be included in the wider study area.</p> <p>Due to the distinct difference between workforce and supply chain, the applicant is expected to define a separate economic study area for these two distinct elements.</p> <p>The economic study area should differentiate between unskilled/semi-skilled labour, skilled labour, and supply chain tiers, reflecting realistic commuting patterns, availability of local skills, and cumulative</p>	Under discussion
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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>between unskilled/semi-skilled labour, skilled labour, and supply chain tiers is deemed not to be a proportionate approach.</u></p> <p>SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</p>	workforce demands from concurrent infrastructure projects.	
3.9.3	Data sources	<p>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 [APP-265].</p> <p><u>National Grid provided the following comments in response to the query raised:</u></p> <p><u>Baseline data sources are presented in various topics in Chapter 15 (Socio-economics, Recreation and Tourism) of the ES [APP-265]* including workforce employment (i.e. major occupational group, skills and qualifications, industrial group), supply chain impact (i.e. industrial group) and tourism impact (i.e. tourism economy).</u></p>	Data sources can be improved to corresponding expected impacts by thematic area i.e. workforce employment impact, supply chain impact, tourism impact. Recommend engagement with Regional Skills Co-ordination Function.	Under 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>”. A meeting</p>	SCC welcomes engagement on assessment methodology but expects a structured approach that differentiates between workforce and supply chain impacts, in line with the Supplementary Guidance Document: Skills, Workforce and Supply Chain Assessment and Mitigation. The study area must be clearly defined for both	Under discussion Agreed

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>was held on 12 September 2024 to seek to agree the points raised in the Scoping Opinion.</p> <p>SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</p>	<p>elements, considering workforce mobility by skill level and contract duration, as well as supply chain reach beyond the immediate locality.</p> <p>SCC expects a scenario-based assessment of workforce availability, ensuring worst-case scenarios are used when assessing displacement risks, housing pressures, and cumulative effects. The assessment must also provide a clear breakdown of workforce phases, anticipated labour sources, and structured supply chain opportunities at hyper-local, local, and regional levels. Methodology should be pre-agreed with SCC to ensure robustness and alignment with wider socio-economic modelling.</p> <p>SCC responded to the 3rd Technical Note in an e-mail dated 4 April 2025. The e-mail stated that SCC were in agreement with the Technical Note and had no further comments / concerns.</p>	
3.9.5	Key parameters and assumptions	<p>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) [APP- 265] of the ES. The key parameters and assumptions presented are considered appropriate.</p>	<p>SCC agrees that the assessment on preliminary information is iterative and should evolve accordingly. Assumptions and parameters should be reviewed alongside the methodology and approach development.</p>	Agreed Under discussion

EIA – Baseline Conditions

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
3.9.6	Baseline conditions and receptors	<p>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 [APP-265]. The baseline conditions and receptors presented are considered appropriate.</p> <p><u>National Grid provided the following SCC comments in response to the query raised:</u></p> <ul style="list-style-type: none"> <u>The baseline data is presented as agreed in the Scoping Report are noted, and Scoping Opinion. Baseline data for local training providers and local businesses workforce displacement fall beyond the scope of the ES chapter.</u> <p><u>Cumulative impacts NG will continue to engage with SCC on workforce demand are presented in Chapter 17 (Cumulative Effects) of the ES [APP-281]. this matter.</u></p>	<p>Broadly agree with the baseline conditions and receptors identified in Section 15.5 of the ES but requests greater focus on:</p> <p>The capacity and responsiveness of local training providers to meet anticipated demand, ensuring alignment with existing and emerging sector requirements.</p> <p>The cumulative impact of workforce demand from multiple NSIPs, with clear modelling of skills gaps, displacement risks, and potential mitigation strategies.</p> <p>The resilience of local businesses to workforce displacement, including sector-specific vulnerability assessments and identification of support mechanisms to sustain local economic activity.</p>	Under discussion

EIA – Embedded, Standard and Additional Mitigation Measures

3.9.7	Embedded mitigation	<p>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 [APP-265]. Embedded mitigation is considered</p>	<p>Weak response on embedded measures relating to socio-economic, recreation and tourism. Suggest this needs to be revisited by developer as it currently only considers environmental measures such as routing and temporary works.</p> <p>SCC seeks clearer commitments to ensure that mitigation is proactive and responsive to</p>	Under discussion
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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><u>National Grid provided the following SCC comments in response to the query raised:</u></p> <p><u>Mitigation measures proposed are set out in paragraph 15.6.5 to 15.6.11 of Chapter 15 (Socio-economics, Recreation, and Tourism) of the ES [APP-265]. NG will continue to engage with SCC on this matter.</u></p>	<p>cumulative socio-economic impacts arising from multiple NSIP projects.</p>	
3.9.8	Standard mitigation	<p>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 [APP-265] and set out in the Outline CoCP [APP-300 document reference 7.2]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><u>National Grid provided the following comments in response to the query raised:</u></p> <ul style="list-style-type: none"> <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</u> 	<p>SCC supports the standard mitigation measures proposed but requires a stronger commitment to:</p> <ul style="list-style-type: none"> Maximising local employment opportunities, with clear targets and monitoring mechanisms. Securing apprenticeships and training schemes in collaboration with Suffolk training providers. Strengthening commitments to local business engagement, including SMEs. Implementing real-time monitoring mechanisms for employment, wage inflation, and workforce displacement risks, ensuring adaptive mitigation. Ensuring collaboration across NSIPs in Suffolk to address cumulative socio-economic pressures proactively. 	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>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> <ul style="list-style-type: none"> • <u>However, the Applicant remains committed to supporting employment, skills and workforce development at a local and regional level through its wider corporate programmes and community benefit initiatives. These initiatives take a coordinated, long term approach to electricity industry skills and the green economy and are delivered independently of individual DCO applications, recognising that meaningful skills development requires sustained investment beyond the lifespan of a single project</u> <p>SCC comments are noted, and <u>National Grid</u> will continue to engage with SCC on this matter.</p>		

ID	Matter	National Grid's Position	Suffolk 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 [APP-265]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><u>National Grid provided the following comments in response to the query raised:</u></p> <p><u>The scale of construction employment arising from the Project is modest. The Environmental Statement concludes that the Project would not give rise to significant adverse socio-economic effects in relation to employment or skills. However, as stated above, the Applicant is committed to supporting employment, skills and workforce development at a local and regional level through its wider corporate programmes and community benefit initiatives.</u></p>	<p><u>SCC provided the following comments during their review of the Statement of Common Ground on 16 October 2025:</u></p> <p><u>The additional mitigation measures are not considered adequate in addressing the full socio-economic impacts, particularly in relation to skills, education, and employment. The measures focus primarily on minimising disruption to recreation, tourism, and community access. Without these commitments, the Project risks missing a critical opportunity to deliver a meaningful and lasting socio-economic legacy for Suffolk communities. SCC position pending sight of the ES</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 [APP-265]. The assessment of effects during</p>	<p>SCC acknowledges the commitment to a more detailed assessment of construction effects in the future and supports this approach. SCC recommends that the assessment utilise the Supplementary Guidance Document: Skills, Workforce and Supply Chain Assessment and Mitigation to</p>	Under discussion
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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>construction presented is considered appropriate.</p> <p><u>SCC comments are noted. In consideration of the new Socio-economic Effects of NSIPs Supplementary Guidance Document (SPD) developed by SCC, the ES chapter has identified the direct impact (i.e. construction workforce) and indirect impact (i.e. supply chain) – however, material supply and demand would vary significantly, and it is not possible to specify sources at the time of submission of the DCO application as stated in Paragraph 15.7.7. of the ES Chapter 15 [APP-265] during construction. Operational impacts have been scoped out in accordance with the Scoping Report and scoping Opinion. National Grid will work constructively with Local Authorities and local partners to understand priorities relating to skills and employment and to support, where appropriate, initiatives that leave a positive legacy for communities. These activities will be progressed through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with established guidance.</u></p> <p><u>The matrix presented in Chapter 15 of the ES [APP-265] comprises five levels</u></p>	<p>ensure accurate and appropriate determination of construction effects and corresponding interventions. This should be aligned with NPS EN-1 (5.13.4) to ensure best practice in assessing and mitigating socio-economic impacts.</p>	

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>of effect significance: High, Medium, Low, Very Low and No change. This contrasts with the three levels of High, Medium and Low, outlined in the SPD. The use of the five-level matrix in the ES enables a more nuanced assessment of potential impacts on the local economy and local employment. However, this methodological difference does not materially alter the overall conclusions of the assessment. SCC comments are noted, and NG will continue to engage with SCC on this matter.</u></p>		
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 [APP-265]. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p><u>National Grid provided the following comments in response to the query raised:</u></p> <p><u>The operational employment assessment has been scoped out as agreed in the Scoping Report and Scoping Opinion.</u></p>	<p>The presented operational socio-economic effects are unclear, <u>specifically with regards to skills, education and employment.</u></p>	Under discussion
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.9.12	Outline CoCP	<p>The Outline CoCP [APP-300] includes all relevant construction related</p>	<p>SCC acknowledges discussions on the Outline CoCP but considers additional</p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>mitigation measures specified in Chapter 15 (Socio-economics, Recreation and Tourism) of the ES [APP-265], 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 [APP-300].</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP [APP-300].</p> <p>A further iteration of the Outline CoCP [APP-300] was issued in May 2025 following the meeting and feedback in writing.</p> <p><u>National Grid provided the following SCC comments in response to the query raised:</u></p> <ul style="list-style-type: none"> <u>The scale of construction employment arising from the Project is modest. The Environmental Statement concludes that the Project would not give rise to significant adverse socio-economic effects in relation to employment or skills. However, as stated above, the Applicant is committed to supporting employment, skills are noted, and workforce development at a local and regional level through its wider corporate programmes and community benefit initiatives</u> 	<p>socio-economic mitigation and monitoring is required as a result of the above responses. For examples:</p> <ul style="list-style-type: none"> Legally enforceable socio-economic and skills commitments within the DCO. A robust monitoring and reporting framework for economic and workforce impacts. Defined responsibilities for mitigating adverse effects on local businesses and labour markets and capitalising on positive effects. 	

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<ul style="list-style-type: none"> Local economy, local employment and tourism economic impacts are not anticipated to be significant. Therefore, monitoring for economic and workforce impacts NG will not be required. <p>Responsibilities for mitigating potential adverse effects continue to engage with SCC on Socio-economics, Recreation and Tourism are set out in the Outline CoCP [APP-300] this matter.</p>		

Other matters as required

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	Suffolk 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) [APP-126] 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> <p><u>Updated Position (February 2026):</u> <u>SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</u></p>	<p>No reference in TA to DfT water preferred policy (EN-1 5.14.16) nor SCC Guidance for NSIPs https://www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects-including-nsips/nsip-information/nsip-information-for-developers-and-project-promoters</p>	Under Discussion
EIA – Approach and Methods				
3.10.2	Study area	<p>The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p> <p><u>Updated Position (February 2026):</u> <u>SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</u></p>	<p><i>Understood Position from Response to January 2025 Draft SoCG:</i></p> <p>The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate, subject to checking that our comments in the PEIR review have been included in terms of scoping. Specific concern would be inclusion of A140 with in scope, particularly</p>	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
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 (February 2026):</u> <u>National Grid will continue to engage with SCC on this matter.</u></p>	<p>in terms of road safety, cumulative traffic* and AIL accessibility over structures.</p> <p>* noting that other NSIPs are now potentially in scope.</p> <p><u>SCC are reviewing the information provided in the DCO application. SCC has yet to have sight of ES and supporting data to comment</u></p>	Under Discussion
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>SCC raised in their statutory consultation response that they accept scoping out of transport issues from the operational phase except for AIL movements. AIL movements during operation would be adhoc and not result in likely significant effects therefore as per the Scoping Opinion received from the Planning Inspectorate they will not be assessed in the ES.</p> <p><u>Updated Position (February 2026):</u> <u>SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</u></p>	<p><i>Understood Position from Response to January 2025 Draft SoCG:</i></p> <p>SCC email 4th Nov 2024 - Transport – concern over consultant's reliance upon a generic access design. Cumulative impacts of projects on PROW from multiple projects also needs to be assessed.</p> <p>National Grid response March 2025: NG have provided additional details which SCC are reviewing. Most likely area for discussion will be how sensitivity is quantified as this tends to be subjective.</p>	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
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> <p><u>Updated Position (February 2026):</u> <u>National Grid will continue to engage with SCC on this matter.</u></p>	<p><u>SCC are reviewing the information provided in the DCO application.</u></p> <p>SCC has yet to have sight of ES and supporting data to comment</p>	Under Discussion
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> <p><u>Updated Position (February 2026):</u> <u>National Grid will continue to engage with SCC on this matter.</u></p>	<p><u>SCC are reviewing the information provided in the DCO application.</u></p> <p>SCC has yet to have sight of ES and supporting data to comment</p>	Under Discussion
EIA – Embedded, Standard and Additional Mitigation Measures				
3.10.7	Embedded mitigation	<p>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</p>	<p><i>Understood Position from Response to January 2025 Draft SoCG:</i></p> <p>SCC email 4th Nov 2024 - Transport – concern over consultants assuming diversions onto public highways are acceptable, and more generally not following guidance and policies.</p>	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>its nature and scale, to address potential effects.</p> <p><u>Updated Position (February 2026):</u> <u>SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</u></p>	<p>SCC concerns due to cumulative impact of 'embedded mitigation' for adjacent NSIPs specifically creation of new network peak due to coincidental shift changes have yet to be reviewed</p>	
3.10.8	Standard mitigation	<p>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.</p> <p><u>Updated Position (February 2026):</u> <u>SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</u></p>	<p><i>Understood Position from Response to January 2025 Draft SoCG:</i></p> <p>SCC raise concerns about the application of a standard bellmouth or crossing design without considering site specific features such as topography and road width.</p>	Under Discussion
3.10.9	Additional mitigation	<p>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.</p> <p><u>Updated Position (February 2026):</u> <u>National Grid will continue to engage with SCC on this matter.</u></p>	<p>SCC position will be finalised following full review of TA and ES data.</p>	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
EIA – Assessment Conclusions				
3.10.10	Construction effects	<p>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.</p> <p><u>Updated Position (February 2026):</u> <u>SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</u></p>	<p><i>Understood Position from Response to January 2025 Draft SoCG:</i> SCC email 4th Nov 2024 - Transport – potential loss of trees and hedgerows.</p>	Under Discussion
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.10.11	Outline CoCP	<p>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.</p> <p>Meeting held on 9th October to agree on the structure for the Outline CoCP [APP-300].</p> <p><u>Updated Position (February 2026):</u> <u>National Grid will continue to engage with SCC on this matter.-</u></p>	<p><u>LHA has yet to review the CoCP and was not involved in the meeting of the 9th October.</u></p> <p><u>Under review</u></p>	Under Discussion
Transport Assessment (TA) – Regulatory, Planning Policy Context and Guidance				
3.10.12	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Traffic and Transport</p>	<p>No reference in TA to DfT water preferred policy (EN-1 5.14.16) nor SCC Guidance for NSIPs https://www.suffolk.gov.uk/planning-</p>	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>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.</p> <p><u>Updated Position (February 2026):</u> <u>SCC comments are noted,</u> <u>and National Grid will continue to engage with SCC on this matter.</u></p>	<p>waste-and-environment/major-infrastructure-projects-including-nsips/nsip-information/nsip-information-for-developers-and-project-promoters</p>	

Transport Assessment – Approach and Methods

3.10.13	Study Area	<p>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.</p> <p><u>Updated Position (February 2026):</u> <u>SCC comments are noted,</u> <u>and National Grid will continue to engage with SCC on this matter.</u></p>	<p>The study area should also include PROW and WCH routes that interact with the SARs.</p> <p><u>SCC remains concerned about the cumulative impacts of all NSIP related traffic, including that proportion arising from this project, particularly on the A140 between the A14 and Diss in terms of capacity, delay and road safety.</u></p>	Under Discussion
3.10.14	Multimodal Strategy	<p>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</p>	<p>SCC reviewing that the multi-modal assessment is sufficient.</p>	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>network as presented within Appendix G (Section 6.2 (Construction Traffic Generation and Routing – Multi-modal Transport Report Assessment)) of the TA [APP-340].</p> <p>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).</p> <p><u>Updated Position (February 2026):</u> <u>National Grid will continue to engage with SCC on this matter.</u></p>		
3.10.15	Junction Capacity Assessment Methodology	<p>Preliminary junction capacity assessments has been undertaken to establish whether there is a requirement to carry out a full assessment of the junctions with a traffic 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</p>	Under review.	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>capacity or over capacity, a traffic model is required.</p> <p>The capacity assessment methodology used is considered appropriate.</p> <p><u>Updated Position (February 2026):</u> <u>National Grid will continue to engage with SCC on this matter.</u></p>		
3.10.16	Junction Modelling	<p>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].ES. The assessment methodology used is considered appropriate.</p> <p><u>Updated Position (February 2026):</u> <u>National Grid will continue to engage with SCC on this matter.</u></p>	<p>SCC reviewing that the junction assessment methodology is acceptable and appropriate.</p>	Under Discussion
3.10.17	Assessment of WCH	<p>The assessment of WCH impacts as a result of the Project is presented in Section 6.187-4 (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</p>	Under review	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>assessment methodology used is considered appropriate.</p> <p><u>Updated Position (February 2026):</u> National Grid will continue to engage with SCC on this matter.</p>		
3.10.18	Impact on Parking	<p>The methodology for the assessment of impact to on-street parking is presented within Section 6.165 (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.</p> <p><u>Updated Position (February 2026):</u> SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</p>	<p><u>Whilst the methodology of how the impacts are assessed is important SCC will also have comments on the legal process and consultation that will be required to implement any traffic regulation orders. SCC will respond once we have received the ES</u></p>	Under Discussion
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 (Baseline 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</p>	Under review.	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>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> <p><u>Updated Position (February 2026):</u> <u>National Grid will continue to engage with SCC on this matter.</u></p>		

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</p>	<p>SCC are reviewing <u>will respond once we have received</u> the <u>information submitted for the DCO.</u>ES</p>	Under Discussion
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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		are considered appropriate and have been discussed with SCC at Thematic Group and Regional Meetings. <u>Updated Position (February 2026): National Grid will continue to engage with SCC on this matter.</u>		
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. <u>Updated Position (February 2026): SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</u>	No reference to SCC Guidance for NSIPs https://www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects-including-nsips/nsip-information/nsip-information-for-developers-and-project-promoters	Under Discussion
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. <u>Updated Position (February 2026): National Grid will continue to engage with SCC on this matter.</u>	Under review.	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
Transport Assessment – Future Baseline Conditions				
3.10.23	Growth Factors	<p>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.</p> <p><u>Updated Position (February 2026):</u> <u>National Grid will continue to engage with SCC on this matter.</u></p>	Under review.	Under Discussion
3.10.24	Cumulative Developments	<p>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 and 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.</p> <p><u>Updated Position (February 2026):</u> <u>SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</u></p>	<p>5.4.1 – “Committed developments are identified within the ES Appendix 15.3: Long List of Other Developments (application document 6.3.15.3)” – SCC will respond once we have received the ES.</p> <p>There are no Committed Developments listed in the TA.</p>	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
Transport Assessment – Trip Generation				
3.10.25	Key Assumptions	<p>Key assumptions associated with the Traffic and Transport assessment are summarised in Section 16.4 of Chapter 16 (Traffic and Transport) of the Environmental Statement (ES) [APP-271] and Section 6.7.2 of Chapter 6 of the TA [APP-333]. Transport Assessment. The key assumptions presented are considered appropriate.</p> <p><u>Updated Position (February 2026):</u> <u>SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</u></p>	<p>6.2.3 – SCC objects to HGV deliveries being made over the weekend.</p> <p>6.2.8 – The assumption of a vehicle occupancy of 2 people per vehicle is optimistic and unrealistic.</p>	Under Discussion
3.10.26	Methodology	<p>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.</p> <p><u>Updated Position (February 2026):</u> <u>National Grid will continue to engage with SCC on this matter.</u></p>	Under review.	Under Discussion
3.10.27	Construction Vehicle Trips	<p>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.</p>	Under review based on experience being gained from other NSIPs in the delivery phase.	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>identifying peak-day vehicle movements for each construction activity to ensure a robust and conservative impact. This is presented in Section 6.2 (Construction vehicles overview) of the TA [APP-333]. The trip generation is considered appropriate.</p> <p><u>Updated Position (February 2026)</u> <u>National Grid will continue to engage with SCC on this matter.</u></p>		

Transport Assessment – Trip Generation

3.10.28	Construction Workforce Trips	<p>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].</p> <p>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.</p>	To be reviewed once final data provided in the application.	Under Discussion
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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<u>Updated Position (February 2026)</u> <u>National Grid will continue to engage with SCC 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.	<u>Agreed. No conclusion available in the TA</u>	<u>Agreed Under Discussion</u>
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.	SCC agrees that these are considered clear and sufficient, <u>albeit it shall be clear that the ultimate responsibility for oversight of the CTMP remains with NG.</u>	Agreed
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] . These pre- and post-construction surveys are considered appropriate for the Project. <u>Updated Position (February 2026)</u> <u>SCC comments are noted,</u> <u>and National Grid will continue to engage with SCC on this matter.</u>	5.2.1 – AIL routes will need to be reinspected prior to their use in case any structures have become unsuitable. 5.2.3 – SCC would welcome the opportunity to view the pre-condition survey when it is undertaken, not just following reinstatement.	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
3.10.32	Traffic Management Measures	<p>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 appropriate and adequate in terms of their nature and scale to address potential construction impacts.</p> <p><u>Updated Position (February 2026)</u> <u>SCC comments are noted,</u> <u>and National Grid will continue to engage with SCC on this matter.</u></p>	<p><u>SCC concerned about potential restrictions in</u> <u>Potential issue with</u> 5.8.3 regarding cyclists and pedestrians being able to use closed roads. See also 3.10.43</p>	Under Discussion
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><u>Updated Position (February 2026)</u> <u>SCC comments are noted,</u> <u>and National Grid will continue to engage with SCC on this matter.</u></p>	<p>Under review. These will need to sufficient to demonstrate that during construction the impacts are not materially greater than those assessed on the ES or TA.</p>	Under Discussion
Outline Construction Worker 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 (Appendix B of the Outline CTMP) [APP-311]. All relevant legislation, policy, and guidance have been identified and appropriately</p>	<p>No reference to SCC Guidance for NSIPs https://www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects-including-nsips/nsip-information/nsip-information-for-developers-and-project-promoters</p>	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>considered to inform the Outline CWTP [APP-311].</p> <p>Updated Position (February 2026) The Outline CWTP [APP-311] was updated for the DCO submission in August 2025. This matter is discussed in Section 3 (Policy Review) of the Outline CWTP [APP-311]. SCC comments are noted, and National Grid will continue to engage with SCC 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>Updated Position (February 2026) 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 Outline CWTP [APP-311]. National Grid will continue to engage with SCC on this matter.</p>	<p>Under review. Unsure how the references in the CWTP Table 4.1 relate to those found on the PAR plans, could we please have clarity on this? Under review</p>	Under Discussion
3.10.36	Targets, Strategy, and Measures	<p>Targets are set out within Section 6 of the CWTP (Appendix B) of the Outline CTMP. Strategy and Measures are set out within Section 8 of the Outline CWTP [APP-311].</p> <p>The construction targets set out are considered to be relevant and</p>	Under review.	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>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><u>Updated Position (February 2026) The Outline CWTP [APP-311] was updated for the DCO submission in August 2025. These matters are discussed in Section 5 (Targets) and Section 7 (Travel Plan Strategy and Measures) of the Outline CWTP [APP-311]. National Grid will continue to engage with SCC on this matter.</u></p>		
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><u>Updated Position (February 2026) The Outline CWTP [APP-311] was updated for the DCO submission in August 2025. This matter is discussed in Section 8 (Monitoring and Review) of the Outline CWTP [APP-311]. National Grid will continue to engage with SCC on this matter.</u></p>	Under review	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
Construction Access Strategy and Design				
3.10.38	Construction Access Approach	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. <u>Updated Position (February 2026)</u> <u>National Grid will continue to engage with SCC on this matter.</u>	Agreement in principle but subject to understanding the final volumes of construction traffic stated within the application.	Under Discussion
3.10.39	Primary Access Route Selection	Routes on local roads proposed to be utilised as Primary Access Routes (PARs) are shown in the Construction Access Plans within Appendix C of the Outline CTMP [APP-312 to APP-320 inclusive] . These have been discussed with Suffolk County Council 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>Updated Position (February 2026)</u> <u>National Grid will continue to engage with SCC on this matter.</u>	Agreement in principle but subject to understanding the final volumes of construction traffic stated within the application.	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
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 Construction Access Plans within Appendix C of the Outline CTMP [APP-312 to APP-320 inclusive]. CTMP. These locations are considered to be 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 Suffolk County Council. These locations are considered to be suitable in principle, and remaining comments arising from the Stage 1 RSAs will be addressed in consultation with Suffolk County Council as the Overseeing Authority.</p> <p><u>Updated Position (February 2026) SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</u></p>	Under review. On site surveys will be required to check actual site conditions particularly visibility, road widths and geometry.	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
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> <ul style="list-style-type: none"> • Schedule 6, Part 1 - Streets Subject to Permanent Alteration of Layout. • Schedule 6, Part 2 - Street Subject to Temporary Alteration of Layout. <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 Suffolk County Council during an engagement session in April 2025, and further to this Stage 1 Road Safety Audits have been undertaken for each location, overseen by Suffolk County Council. These locations are considered to be suitable in principle, and remaining comments arising from the Stage 1 RSAs will be addressed in consultation with Suffolk County Council as the Overseeing Authority.</p>	<p>SCC reviewing information provided within the DCO application. For review once all TA and ES data is available</p>	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
3.10.42	Traffic Management	<p><u>Updated Position (February 2026)</u> <u>National Grid will continue to engage with SCC on this matter.</u></p> <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 Suffolk County Council 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>Updated Position (February 2026)</u> <u>SCC comments are noted,</u> <u>and National Grid will continue to engage with SCC on this matter.</u></p>	<p>Under review. All references to streets must be those in the street gazetteer https://www.findmystreet.co.uk/</p> <p>Implementation of speed reductions should not be taken as delivering the posted speeds and using these as the design criteria. Additional speed management <u>or controls</u> may be required <u>to ensure compliance with speed limits</u>.</p>	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
3.10.43	Traffic Regulation Orders and Temporary Traffic Regulation Orders	<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], and set out in Schedule 13 of the draft DCO (document reference 3.1) [APP-056].</p> <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 Suffolk County Council 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> <p>Updated Position (February 2026) SCC comments are noted.</p>	<p>Under review. All references to streets must be those in the street gazetteer https://www.findmystreet.co.uk/</p> <p>SCC will be expecting justification for the necessity of such traffic orders and an understanding on how they will be implemented and any consequential impacts on the fabric of the highway (e.g.eg removal of road markings).)</p>	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		and National Grid will continue to engage with SCC on this matter.		
3.10.44	Highway Mitigation Design on National Highways Infrastructure	Further to Matter ID 3.10.41 (Highway Mitigation Design), it has been identified that one proposed mitigation within Suffolk impacts primarily upon the Strategic Road Network (SRN) managed by National Highways. This is located at Junction 31 of the A12 and is described in Section 5.98 of the Outline CTMP [APP-309] . On the basis that this proposed mitigation impacts principally upon the network managed by National Highways, it is considered appropriate for National Highways to be the Overseeing Authority for the Road Safety Audit in this location.	Agreed, although any work on the local road network beyond the SRN boundary will require approval from the LHA (e.g. A1214) .	Agreed

Abnormal Indivisible Load (AIL) Access

3.10.45	Abnormal Indivisible Load (AIL) Access Approach	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 Suffolk County Council in March 2025.	Under review. Suffolk Constabulary is responsible for routing loads with regard to width and length. SCC will require the applicant to demonstrate that any route is feasible in terms of the capacity of highway structures noting that some on the network have restrictions in terms of Special Type General Order and Special Order (STGO/SO) loads.	Under Discussion
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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>This approach, in principle, is considered to be suitable for AIL access for the Project at the current stage of project development.</p> <p><u>Updated Position (February 2026)</u> <u>SCC comments are noted,</u> <u>and National Grid will continue to engage with SCC on this matter.</u></p>		
3.10.46	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 CTMP).</p> <p>These have been developed following consultations with Suffolk County Council. As part of these consultations, draft route information was shared in July 2024 and April 2025. National Grid will continue to engage with Suffolk County Council as the proposed AIL access routes are developed further, including with respect to the ongoing structural investigations.</p> <p><u>Updated Position (February 2026)</u> <u>SCC comments are noted,</u> <u>and National Grid will continue to engage with SCC on this matter.</u></p>	<p>Under review. Suffolk Constabulary is responsible for routing loads with regard to width and length.</p> <p><u>Methodology of structural review is yet to be agreed.</u></p>	Under Discussion
3.10.47	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 Suffolk</p>	<p>Under review. SCC has developed a process for review, inspection and assessment of highway structures to confirm suitability for STGO or Special Order AIL</p>	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>County Council in relation to structures on the sections of the Local Road Network impacted by these proposed routes. As part of these consultations, draft route information was shared in July 2024 and April 2025, and information around impacted structures requested. Specific concerns raised by Suffolk County Council 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 (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</p>	<p>movements, and this will be shared with the Applicant.</p> <p><u>SCC note that having a process in parallel to the DCO introduces an element of risk that structures are identified that cannot accommodate AILs and that the route is unviable.</u></p>	

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>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> <p><u>Updated Position (February 2026)</u> <u>SCC comments are noted,</u> <u>and National Grid will continue to engage with SCC on this matter.</u></p>		
3.10.48	Abnormal Indivisible Load (AIL) Mitigation and Management Measures	<p>The locations of proposed mitigation measures associated with proposed AIL Routes are shown in the Construction Access Plans within Appendix C of the Outline CTMP [APP-312 to APP-320].CTMP. These mitigation measures have been developed consistently with the wider Highway Mitigation approach for the Project (ID 3.10.41) 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</p>	Under review. Mitigation can only be finalised following structural investigations (3.10.48).)	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>[APP-309], and Section 6 of the AIL Access Strategy [APP-310] (Appendix A of the CTMP). This approach, in principle, is considered to be suitable for AIL access for the Project at the current stage of project development.</p> <p>Updated Position (February 2026) SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</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	Suffolk County Council's Position	Status
PRoW				
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].</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>We would have welcomed a separate chapter to enable SCC PRoW to fully understand the cross-discipline effects. Having PRoW matters spread over many disciplines makes it less effective and efficient to comment on impacts on the proposals with regards to PRoW.</u></p>	Not agreed/Under Discussion
3.11.2	Types of PRoW	<p>Types of PRoW intended to be considered as part of the Management Strategy were shared with Suffolk County Council 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>	<p><u>Long distance promoted routes, and circular routes should also be included in the list to be assessed. These can be found on the Discover Suffolk website.</u></p>	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<ul style="list-style-type: none"> • Formally designated PRowS (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><u>Updated Position (February 2026) SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</u></p>		
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 SCC within Section 2.4 of the PRow Methodology Statement document in April 2025. This 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. 	<p><u>Under review and discussion. SCC PRow continue to review the PRow management plan. We would benefit from receiving the latest dated draft of the PRowMP.</u></p>	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<ul style="list-style-type: none"> 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><u>Updated Position (February 2026) SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</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><u>Updated Position (February 2026) SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</u></p>	<p><u>Under review and discussion. SCC PRow continue to review the PRow management plan. We would benefit from receiving the latest, dated draft of the PRowWMP.</u></p>	Under Discussion
3.11.5	Reinstatement Approach	<p>All PRow's 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</p>	<p><u>SCC would welcome the opportunity to view the pre-condition survey when it is undertaken, not just following reinstatement.</u></p>	Under Discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p>works will be undertaken in consultation with Suffolk County Council 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><u>Updated Position (February 2026) SCC comments are noted, and National Grid will continue to engage with SCC on this matter.</u></p>		

3.12 Cumulative Effects

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

ID	Matter	National Grid's Position	Suffolk 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) [APP-126] and Section 17.2 of Chapter 17 (Cumulative Effects) [APP-281] of the ES. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	<u>The policy and legislation detailed and implemented within the ES are considered appropriate in their breadth and content.</u> SCC position pending sight of the ES.	Under discussion Agreed
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 and 17.5 of Chapter 17 (Cumulative Effects) [APP-281] of the ES.	<u>SCC generally agrees that the data sources collected are sufficient to inform the assessments.</u> SCC position pending sight of the ES.	Under discussion Agreed
3.12.4	Assessment methodology	The methodology for assessing Cumulative Effects was agreed through the EIA Scoping Report and Scoping	The methodology for assessing Cumulative Effects was agreed through the EIA	Agreed

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		Opinion received from the Planning Inspectorate.	Scoping Report and Scoping Opinion received from the Planning Inspectorate.	
3.12.5	Key parameters and assumptions	Key parameters and assumptions associated with the Cumulative Effects assessment are summarised in Section 17.5 and 17.64 of Chapter 17 (Cumulative Effects) [APP-281] of the ES. The key parameters and assumptions presented are considered appropriate.	SCC <u>agrees with position pending sight of the key parameters and assumptions ES.</u>	Agreed Under discussion

EIA – Baseline Conditions

3.12.6	Baseline conditions and receptors	The baseline conditions and receptors for Cumulative Effects are presented <u>within the environmental topic chapters (Chapters 6 – 16 in Section 17.5 of Chapter 17 (Cumulative Effects) of the ES).</u> The baseline conditions and receptors presented are considered appropriate.	SCC <u>agrees with position pending sight of the baseline conditions and receptors ES.</u>	Under discussion Agreed
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EIA – Embedded, Standard and Additional Mitigation Measures

3.12.7	Embedded mitigation	<u>The assessment of cumulative effects considered the residual effects identified during construction and operation (and maintenance) within the environmental topic chapters (Chapters 6 – 16 of the ES).</u> Embedded mitigation measures, designed as an inherent part of the Project <u>relevant to Cumulative Effects,</u> are set out in the <u>environmental topic chapters Section 17.6 of Chapter 17 (Cumulative Effects) of the ES.</u>	SCC considers that <u>further embedded mitigation may be required.</u> SCC position <u>pending sight of the ES.</u>	Under discussion
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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
3.12.8	Standard mitigation	<p>Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>SCC considers that further standard mitigation may be required. SCC position pending sight of the ES.</p>	Under discussion
3.12.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 17.4 and 17.56 of Chapter 17 (Cumulative Effects) [APP-281] of the ES. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p><u>A response from the Applicant will be provided as part of the relevant representation responses.</u></p>	<p><u>SCC considers that additional mitigation measures beyond those identified in ES chapters should have been identified. In particular, in regard to Landscape and Visual impacts in the immediate vicinity of the Bramford Substation.</u></p> <p><u>SCC provided the following comments in their relevant representations dated 27th November 2025:</u></p> <p><u>Table 17.3 acknowledged that for some groups, the cumulative effect of noise, visual, and access impacts is considered</u></p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>Updated Position (February 2026)</u> <u>National Grid will continue to engage with SCC on this matter.</u></p>	<p><u>significant: "Owing to the significance of visual effects within 500 m of the Order Limits, and as further mitigation is unlikely to be practicable, it is anticipated that the residual cumulative effect of visual and noise amenity effects with access and delay effects would lead to a significant intra-project cumulative effect on pedestrians, cyclists and horse riders. However, the significant effects are no greater than reported in Chapter 13: Landscape and Visual". No additional mitigation measures are proposed within the chapter beyond those already identified in the other topic chapters.262.</u></p> <p><u>Recommendation: Given that the chapter concludes further mitigation is "unlikely to be practicable," it is recommended that the Applicant continues to engage proactively with affected communities, particularly those within 500 m of the Order Limits to monitor the real world impacts on pedestrians, cyclists, and horse riders. The Applicant should remain open to implementing targeted, site specific measures or enhancements if significant adverse effects are observed during construction or operation, even if these go beyond standard mitigation. SCC position pending sight of the ES.</u></p>	

EIA – Assessment Conclusions

3.12.10	Construction effects	<p>The assessment of effects during construction is presented in Section</p>	<p><u>SCC has major concerns regarding the conclusions of the cumulative impact</u></p>	Under discussion
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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>17.4 and 17.57 of Chapter 17 (Cumulative Effects) [APP-281] of the ES. The assessment of effects during construction presented is considered appropriate.</u></p> <p><u>Updated Position (February 2026): A response from the Applicant will be provided as part of the relevant representation responses.</u></p> <p><u>National Grid will continue to engage with SCC on this matter.</u></p>	<p><u>assessment. For instance, in regard to construction workforce the assessment concludes a negligible and not significant inter-project cumulative effect on the local economy and local employment. Norwich to Tilbury will experience a temporal overlap with the construction workforces with Sizewell C, Sea Link, and multiple offshore wind projects. This will result in intensive competition for specialist skills in the region. SCC is of the view that the workforce displacement and labour market pressures should be attributed significant and major adverse impacts.</u></p> <p><u>SCC provided the following comments in their relevant representations dated 27th November 2025:</u></p> <p><u>Paragraph 17.4.22 explains that “No monitoring is proposed during construction or operation (and maintenance).” This appears a notable gap given the potential for significant combined impacts on physical activity, mental wellbeing, and community amenity: Recommendation: Public Health recommend targeted monitoring of health and wellbeing outcomes for affected communities is undertaken, especially where significant cumulative effects are identified. Processes should be put in place and documented to communicate and engage with users of PRowS, schools, and community facilities to ensure timely information about closures, diversions, and mitigation measures.</u></p>	

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
3.12.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 17.4 and 17.57 of Chapter 17 (Cumulative Effects) [APP-281] of the ES. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p><u>A response from the Applicant will be provided as part of the relevant representation responses.</u></p> <p><u>Updated Position (February 2026) National Grid will continue to engage with SCC on this matter.</u></p>	<p><u>Additionally, The Applicant should proactively distribute mental health resources (e.g. WellMinds https://simplebooklet.com/wellmindssuffolk#page=1) provide funded Mental Health First Aid training for community members, and support local mental health organisations to mentor volunteers, as recommended in the Suffolk County Council Community Engagement and Wellbeing SGD.</u> SCC position pending sight of the ES.</p> <p><u>SCC considers that the assessment does not fully capture the ongoing cumulative Health and Wellbeing effects on local residents. There are numerous NSIPs in the locality which are increasing causing multiple disruptions to everyday activities and where communities are already experiencing mental health inequalities.</u></p> <p><u>SCC provided the following comments in their relevant representations dated 27th November 2025:</u></p> <p><u>The cumulative effects of multiple infrastructure projects in the same locality can result in significant adverse impacts on community wellbeing, including increased anxiety, loss of control, and emotional distress, as identified in the Suffolk County Council's Community Engagement and Wellbeing SGD. The chapter goes some way to recognise this in Paragraph 17.5.47: "In a number of instances, adverse effects</u></p>	Under discussion

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<p><u>on mental health and wellbeing may be particularly relevant as a result of the scale of other development (for example significant residential or infrastructure development) and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction phases." These impacts may not be fully captured by the EIA process and require mitigation through early, continuous, and collaborative engagement, as well as support for community leaders and volunteers. SCC position pending sight of the ES.</u></p>				
<p>Draft DCO / Outline Management Plans / Mitigation and Monitoring</p>				
3.12.12	Outline CoCP	<p>The Outline CoCP [APP-300] includes all relevant construction related mitigation measures specified in Chapter 17 (Cumulative Effects) of the ES [APP-281] 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 [APP-300].-</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP [APP-300].-</p> <p>A further iteration of the Outline CoCP [APP-300] was issued in May 2025 following the meeting and feedback in writing.</p>	<p><u>SCC considers that additional mitigation may be required during construction. SCC position pending sight of the ES.</u></p> <p>Still under discussion.</p>	Under discussion

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>This comment is similar to comments above, response from the Applicant will be provided as part of the relevant representation responses.</u></p> <p><u>Updated Position (February 2026)</u> <u>National Grid will continue to engage with SCC on this matter.</u></p>		

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	Suffolk County Council's Position	Status
3.13444.1	DCO Requirements	<p><u>National Grid will amend references in Requirement 5 (Archaeology) from "relevant planning authority" to "relevant discharging authority", noting that the latter is already separately defined in Paragraph 1(1) of Schedule 3 to the draft DCO (APP-056).</u></p> <p><u>The proposed core working hours are based on standard hours applied across major infrastructure projects, allowing for efficient delivery while maintaining safeguards to manage noise and other impacts.</u></p> <p><u>The construction works are largely linear and would not occur along the entire</u></p>	<p><u>Schedule 3 (requirements) (requirement 6(2) (archaeology)) – this provision names "the relevant planning authority" as the discharging authority. In Suffolk, the Council should be the discharging authority because archaeology is a county function. This approach is precedent. For instance, requirement 3 (project wide: archaeology and peat) of the Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853) names the Council as the approving authority for archaeological matters.</u></p> <p><u>Schedule 3 (requirements) (requirement 7 (construction hours)) – this provision needs significant reworking in order to allow for community respite. For example, the Council</u></p>	<u>Under Discussion</u>

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>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 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.</u></p> <p><u>The assessment presented in Chapter 14 (Noise and Vibration) of the ES [APP-256] [APP-300], significant effects during the construction phase are not anticipated. The measures set out within the Outline CoCP [APP-300] will be secured via Requirement 4(a) (Construction Management Plans) of the draft DCO within the final CoCP.</u></p> <p><u>National Grid does not consider it justified to amend the core working hours. There are a number of instances within Requirement 7 (Construction hours) that ensure the relevant authority's consent is sought to work outside of the core working hours.</u></p>	<p><u>considers Saturday hours should be between 08:00 and 13:00 and there should be no working on Sundays and Bank Holidays. The Secretary of State considered a similar approach appropriate in the East Anglia ONE North Onshore Wind Farm Order 2022 (S.I.2022/432). Requirement 24 of that Order states the core hours are "between 0700 hours and 1900 hours Monday to Friday and 0700 hours and 1300 hours on Saturdays, with no activity on Sundays or bank holidays", subject to certain exceptions listed in sub-paragraph (2).</u></p> <p><u>Further details can be found in representations.</u></p>	
3.13.2	<u>DCO Wording</u>	<u>The definition of "maintain" included within Article 2(1) of the draft DCO [APP-056] reads as follows (emphasis added):</u>	<u>Article 2(1) (interpretation) – the definition of "maintain" includes the replacement of any part of the authorised development and the</u>	<u>Under discussion</u>

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u><i>“maintain” includes inspect, repair, adjust, alter, dismantle, remove, clear, refurbish, paint, surface treat, decommission, improve, reconstruct or replace any part but not remove, reconstruct or replace the whole, of the authorised development including through the use of robots, helicopters, drones, gadgets or similar devices either remotely controlled or autonomous, provided such works do not give rise to any materially new or materially different environmental effects to those identified in the environmental statement, and any derivative of “maintain” must be construed accordingly.”</i></u></p> <p><u>The current drafting, which is consistent with The National Grid (Bramford to Twinstead Reinforcement) Order 2024, reflects National Grid’s view that there would be no scenario where the whole of the authorised development would or could be reconstructed or replaced using powers of maintenance under Article 4 of the draft DCO.</u></p> <p><u>In respect of the second part of its representation on this point, SCC is directed to Section 4.10 (Operation (and Maintenance)) of Chapter 4 – Project Description of the Environmental Statement (ES) [APP-130].</u></p> <p><u>The ES does not consider any scenarios where large sections of the Project would need to be replaced because such</u></p>	<p><u>replacement of the whole of it. The Council would like to know to what extent “replacement” has been assessed and where this is considered in the Environmental Statement. The Council would like to know to what extent the definition of “maintain” duplicates the applicant’s PD rights.</u></p>	

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		<p><u>scenarios are considered to be very unlikely, whereas the purpose of EIA is to identify likely significant effects.</u></p> <p><u>The environmental effects of maintenance work would be no greater, and likely much lower, than the effects resulting during construction of the Project and so are not reported separately.</u></p> <p><u>Noting the well-established precedent which underpins the current definition of "maintain", National Grid would welcome clarification from SCC as to the relevance of the third and final part of its representation on this point (concerning National Grid's permitted development rights as a statutory undertaker).</u></p>		
3.13.3	<u>DCO wording</u>	<p><u>National Grid notes the point made by SCC.</u></p> <p><u>However, with reference to Article 2(9) of the draft DCO [APP-056] (copied below), National Grid does not consider that an amendment to the definition of "permit scheme" is necessary. By virtue of Article 2(9), any updates to the permit schemes referenced in the draft DCO would have automatic effect in the context of the application of Article 12 (Application of the permit schemes).</u></p> <p><u>Article 2(9) reads as follows:</u></p> <p><u>"References in this Order to any statute, order, regulation or similar instrument are to be construed as a reference to the statute, order, regulation or instrument as</u></p>	<p><u>Article 2(1) (interpretation) – the definition of "permit scheme" means a permit scheme in force on the date on which the Order is made.</u></p> <p><u>The Council consider the definition should allow for the situation where a permit scheme is updated after the date on which the Order is made. It would be strange for an extant permit scheme to control certain works in Suffolk and for a historic permit scheme to control others.</u></p>	

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		<p><u>amended by any subsequent statute, order, regulation or instrument or as contained in any subsequent re-enactment"</u></p>		
3.13.4	DCO wording	<p><u>a. Reference is made to Requirements 4(3) and 5(4) in Schedule 3 to the draft DCO [APP-056], each of which require all "pre-commencement operations" to be carried out in accordance with the outline construction management plans, as well as the outline archaeological mitigation strategy and outline written scheme of investigation. National Grid considers that the outline management plans provide effective control over these excluded works and operations, noting that the approach mirrors that adopted on other recent projects, including Bramford to Twinstead.</u></p> <p><u>b. National Grid has not currently identified any buildings that would need to be demolished. If demolition was to be required, it would be due to unforeseen circumstances.</u></p> <p><u>c. Reference is made to Articles 27 and 28 of the draft DCO [APP-056]. Both Articles require that any land which is possessed temporarily (and in respect of which an interest is not acquired by either National Grid or UK Power Networks) must be restored to the reasonable satisfaction of the landowner, unless otherwise agreed. Compensation is</u></p>	<p><u>Article 2(1) (interpretation) – the definition of "pre-commencement operations" is wide-ranging and goes well beyond the Explanatory Memorandum's ("EM") description of these works as "de minimis or [having] minimal potential for adverse impacts" (paragraph 3.6.6) [APP-057].</u></p> <p><u>Further details can be found in representations.</u></p>	

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		<p><u>payable for any loss or damage arising from the exercise of those temporary possession powers.</u></p> <p><u>d. Reference is made to Section 4.7 (Construction - General) of Chapter 4 – Project Description of the Environmental Statement (ES) [APP-130]. Paragraph 4.7.2 of Chapter 4 notes the potential for certain “pre-commencement operations” to take place following the grant of development consent. Those operations have been assessed as part of the project, rather than individually.</u></p>		
3.13.5	<u>DCO wording</u>		<p><u>Article 3(6) (development consent etc. granted by the Order) – this provision states that the development consent granted by the Order allows works (including demolition of buildings or other structures) within the Order limits to the extent they “relate to, are required by or are incidental to the carrying out of the authorised development”. This is a broad power which does not appear to have been included in the precedents cited by the applicant in paragraph 1. 2. 5 of the EM [APP-057]. It will be remembered that paragraph 1. 2 of Advice Note Fifteen: drafting Development Consent Orders states: “A thorough justification should be provided in the Explanatory Memorandum for every Article and Requirement, explaining why the inclusion of the power is appropriate in the specific case. The extent of justification should be proportionate to the degree of novelty and/ or controversy in relation to the inclusion of that</u></p>	

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			<p><u>particular power</u>". [Emphasis added]. Contrary to the advice, here, no justification for this provision is included in the EM (see paragraph 1. 2. 5 of the EM [APP-057]). To allow SCC to understand the need for this provision, SCC requests that the next draft of the EM is updated to include justification for this provisionprovision. It would also be helpful to know which buildings within SCC's administrative are proposed to be demolished.</p>	
3.13.6	<u>DCO wording</u>	<p>National Grid considers that Article 7(5) of the draft DCO [APP-056] already addresses the point raised by SCC. However, to the extent that SCC has any further concerns, National Grid would be pleased to consider those.</p> <p>For the avoidance of doubt, Article 7(5) states: "<u>Where a transfer or grant has been made in accordance with paragraph (1), the undertaker must notify the relevant planning authority of the same.</u>" "<u>Relevant planning authority</u>" has the meaning given to it in Article 2(1).</p>	<p>Article 7 (consent to transfer benefit of Order) – this article allows any or all of the benefits of the provision of the Order to be transferred, with the consent of the Secretary of State, to others. In the event of such a transfer, owing to its role in determining consents under the dDCO, SCC requests that it is notified as soon as reasonably practicable.</p>	
3.13.7	DCO Wording	<p>National Grid does not have currently have a specific planning permission or DCO in mind. However, and with reference to Paragraph 3.14.2 of the Explanatory Memorandum [APP-057], National Grid is cognisant of the fact that a number of other nationally significant infrastructure projects are situated, or</p>	<p>Article 10(2) (planning permission) – this provides that any planning permissions or DCO which conflict with the authorised development can proceed without the risk of enforcement action being taken notwithstanding any incompatibility between the Project and the development authorised under that planning permission or DCO. It would be helpful if the applicant would confirm</p>	

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		<p><u>proposed to be situated, in proximity to the Project.</u></p> <p><u>This Article has therefore been included on a precautionary basis and seeks to address any risks, both in relation to the Project and also in relation to third party developments, which could arise from the decision in <i>Hillside Parks Ltd v Snowdonia National Park Authority 2022</i> UKSC [30].</u></p>	<p><u>whether it has any specific planning permission or DCO in mind.</u></p>	
3.13.8	<u>DCO wording</u>	<p><u>As a fundamental point of principle, National Grid does not agree that a secondary tier of consents is appropriate or necessary in relation to the exercise of street works powers under Articles 11(1), 14(1), 15(1) and 16(1)(a) of the draft DCO [APP-056].</u></p> <p><u>The nature and extent of those powers is already suitably constrained and will, in any event, be subject to detailed scrutiny as part of the Examination process.</u></p> <p><u>It would be wholly inappropriate, taking account of Parliamentary intentions underpinning the Planning Act 2008 regime, for SCC (or indeed any other highways authority) to be afforded a further opportunity to limit the practical application and exercise of any statutory powers which the Secretary of State has determined are necessary to enable the timely delivery of the Project in response to a critical national need.</u></p>	<p><u>Article 11(1) (street works) – absent a suitable highways side agreement or protective provisions to protect SCC's highways interests, SCC considers art. 11(1) should be subject to the street authority's consent. .</u></p> <p><u>205. The same point applies in respect of the following 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).</u></p>	

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<p><u>National Grid is, however, content for the conduct of the works permitted by the abovementioned Articles to be subject to appropriate and proportionate pre-commencement controls, in accordance with the Protective Provisions included for the benefit of SCC and other local highways authorities at Part 4 of Schedule 16 to the draft DCO.</u></p>		
<p><u>3.13.9 DCO wording</u></p>	<p><u>National Grid notes that the principle of including deemed discharge provisions in the draft DCO [APP-056] is not unique to this Project. The principle has very recent and relevant precedent in the National Grid (Bramford to Twinstead Reinforcement) Order 2024. The inclusion of such provisions is considered justified on the</u></p>	<p><u>Article 11(2) (street works) – Under several of the draft DCO's articles (including article 11(2)), SCC is required to grant approval for certain street works, and provision is made to say that approval must not be “unreasonably withheld or delayed” and there is also a provision that it is deemed to be given after 28 days. In several cases this appears to be unprecedented in DCOs or not well preceded. .</u></p> <p><u>207. SCC will be receiving considerable numbers of requests for approval and will ensure that they are dealt with as quickly as possible. With the deeming provisions included there is no need to also say that the approvals must not be “unreasonably withheld or delayed”.</u></p> <p><u>208. SCC request that the same amendment is made to the following articles: 14(4) (power to alter layout, etc. of streets), 15(2)(a) and (b) (permanent stopping up of streets and public rights of way), 16(2), 16(5)(b) (temporary closure of streets and public rights of way), 17(1)(b) (access to works), 20(3), 20(4)(a) (discharge of water), 49(2) (traffic regulation), 55(1) (procedure regarding certain approvals etc.).</u> Other matters as required</p>		

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
	<p><u>basis that it is essential that the delivery of a project of this scale and critical national importance is not unnecessarily frustrated by matters outside of National Grid's control.</u></p> <p><u>Further, National Grid does not agree with SCC's position that the inclusion of deeming provisions in the draft DCO negates the need for the draft DCO to also state that approvals must not be unreasonably withheld or delayed.</u></p> <p><u>Taking account of the critical national need</u></p>			

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
	<p><u>for the Project,</u> <u>National Grid</u> <u>envisages that</u> <u>there may well</u> <u>be situations</u> <u>where a more</u> <u>straightforward</u> <u>or routine</u> <u>approval is</u> <u>sought from the</u> <u>relevant</u> <u>authority and</u> <u>where it would</u> <u>therefore be</u> <u>reasonable to</u> <u>expect a</u> <u>decision to be</u> <u>proactively</u> <u>taken without</u> <u>delay by the</u> <u>authority at the</u> <u>earliest</u> <u>opportunity –</u> <u>notwithstanding</u> <u>the ultimate fall-</u> <u>back position of</u> <u>a deemed</u> <u>consent</u> <u>mechanism.</u> <u>National Grid</u> <u>would, in</u> <u>practical terms,</u> <u>anticipate</u> <u>working closely</u></p>			

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
	<p><u>with SCC and other relevant authorities to provide advance notice, where practicable, of any requests for approval to which a deeming provision would apply under the draft DCO.</u></p> <p><u>National Grid remains in ongoing dialogue with SCC to ensure that the impacts of the Project are appropriately managed and mitigated.</u></p>			
3.13.10	DCO wording	<p><u>Whilst SCC's commitment to determine all applications for consent or approval as expeditiously as possible is welcomed, National Grid does not consider that a decision period of 56 days would be conducive to the timely delivery of the Project.</u></p>	<p><u>Article 11(3) (street works) – provides that if a street authority fails to respond to an application for consent within 28 days of the application being made, that street authority is deemed to have given its consent. .</u></p> <p><u>210. While SCC will ensure that any application for consent will be dealt with as quickly as possible, it will be remembered that</u></p>	

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		<p><u>National Grid's position is that a 28 day decision making timeframe is both proportionate and appropriate to each of the applications proposed to be made in this 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 of the control of National Grid.</u></p> <p><u>In each instance, the draft DCO [APP-056] allows for the relevant decision-making authority and the undertaker to agree "such other period" as may be appropriate in the circumstances.</u></p> <p><u>In addition to the precedent cited at Paragraph 3.3.3 of the Explanatory Memorandum [APP-057], National Grid notes that there is extensive precedent for a 28 day period in a number of existing Orders, including: The Thames Water Utilities Limited (Thames Tideway Tunnel) Order 2014 (see, for example, Articles 18(9) and 19(8)), the A57 Link Roads Development Consent Order 2022 (see, for example, Articles 14(6) and 18(11)), and the Awel y Môr Offshore Wind Farm Order 2023 (see, for example, Articles 12(6) and 15(6)).</u></p>	<p><u>SCC will be receiving a considerable number of requests for approval across several nationally significant infrastructure projects which have already been consented (For example: East Anglia ONE North Offshore Wind Farm Order 2022 (SI 2022/432), East Anglia TWO Offshore Wind Farm Order 2022 (SI 2022/433), Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853), Sunnica Energy Farm Order 2024 (SI 2024/802), and National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024 / 958). Forthcoming DCO applications for which SCC will be a host authority include National Grid Electricity Transmission's Sea Link application and National Grid Interconnector Holdings Limited's LionLink Interconnector application). A 28-day decision-making period in this context is unrealistic and potentially detrimental to the effective consideration of applications. . 211. Given the volume of work which will arise from the number of NSIPs being delivered in Suffolk, SCC considers 28 days is too short and requests that it is replaced with 56 days. SCC also considers that this period should be paused if the highway authority considers that additional information is reasonably required to make a decision.</u></p> <p><u>212. SCC requests that 28 days is also replaced with 56 days in the following provisions: 14(5) (power to alter layout, etc. of streets); 16(8) (temporary closure of streets and public rights of way); 17(2) (access to</u></p>	

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			works); 20(9) (discharge of water); 22(8) (authority to survey and investigate land), 49(10) (traffic regulation) and 50(5) (felling or lopping). . 213. A similar point applies in respect of paragraph 1(1) (applications made under requirements) of Schedule 4 (discharge of requirements), which is mentioned below.	
3.13.11	<u>DCO wording</u>	National Grid notes SCC's comments and is content to amend Article 12(2)(d) of the draft DCO [APP-056] in order to refer in both instances to "the relevant highway authority". The amendment will be incorporated in the next updated version of the draft DCO.	Article 12(2)(d) (application of the permit schemes) – this provision prohibits "the relevant street authority" from permitting certain works at a certain time but then says "local highway authority" may grant a permit for immediate works. Should those references be to the same body? If not, why not? Also, the term "local highway authority" is not used elsewhere in the dDCO (save in a single definition) and is not a defined term itself. In articles 12(3), (4) and (5) "the relevant highway authority" referred to and SCC wonders whether that term should also be used (whether once or twice) in article 12(2)(d). SCC would welcome the applicant's explanation on this drafting point.	
3.13.12	<u>DCO wording</u>	National Grid would welcome further engagement with SCC Highways in order to better understand their concerns on this point. Notwithstanding those future discussions, National Grid considers that the provisions are appropriate in the context of this Project. The disapplication in Articles 13(3) and (4) of the draft DCO [APP-056] has been deemed acceptable	Article 13(3) and (4) (application of the 1991 Act) – SCC is concerned by the extent of disapplication proposed by article 13(3) and (4).	

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		<p>by the Secretary of State on previous National Grid DCOs, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.</p>		
3.13.13	DCO wording	<p>National Grid notes that Article 16(1) is well-precedented, with the overall power constrained to such temporary diversions or prevention of access as are required for the purposes of carrying out the authorised development.</p> <p>More specifically, reference is made to the Outline Public Rights of Way Management Plan (the Outline PRowMP) [APP-329] which explains, in detail, the management regimes to be adopted in the context of the Project, as well as stating National Grid's clear ambition to minimise disruption to PRow users wherever reasonably practicable.</p> <p>In that context, and with reference to the detailed information included in Table 8.3 of the Outline PRowMP, it is noted that the duration of each temporary closure will vary, but the key principle of only restricting access for as long as necessary to complete the required construction works would be applied at all times.</p> <p>Turning to the second of SCC's comments on this point, National Grid</p>	<p>Article 16 (temporary closure of streets and public rights of way) – by article 16(1), the undertaker may, “for any reasonable time” divert traffic from the street or public right of way; and prevent all persons from passing along the street or PRow. SCC would welcome more information as to what “a reasonable time” might be.</p> <p>217. In addition, SCC 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 authority, before the corresponding street or public right of way in temporarily stopped up, altered or diverted.</p>	

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		<p><u>notes that Article 16(4) already states that if a street or public right of way specified in Parts 1 and 3 of Schedule 8 is to be temporarily closed, altered or diverted, the undertaker must provide the temporary diversion as specified in column (4) of that Part. If a street or public right of way is 'provided', the implication is that it must therefore be open for use.</u></p> <p><u>National Grid does not consider that any amendment to the drafting is necessary.</u></p> <p><u>Article 16(5) states that the street authority must be consulted before the undertaker temporarily closes, alters or diverts any street or public right of way specified as mentioned in paragraph (4).</u></p> <p><u>Given the temporary nature of the diversions, National Grid does not consider that it is feasible for a temporary diversion to be completed to the reasonable satisfaction of the street authority, taking into account its duties to act economically and efficiently.</u></p> <p><u>Therefore, and noting the effect of section 161(1)(b) (breach of terms of order granting development consent) of the Planning Act 2008, National Grid cannot agree to include the additional wording in Article 16.</u></p>		
3.13.14	<u>DCO wording</u>	<u>National Grid does not consider that it is necessary to add any additional wording to clarify that a discharging authority has</u>	<u>Article 16(5)(b) (temporary closure of streets and public rights of way) – this provision refers to the street authority's ability</u>	

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		<p><u>the discretion for reasonable conditions to be attached to an approval or consent.</u></p> <p><u>Article 55(3) (Procedure regarding certain approvals etc) of the draft DCO [APP-056] is clear that where such consent, agreement or approval is granted under the DCO, it will be subject to the same appeal procedure as the requirements including where a condition to which the undertaker objects is included.</u></p>	<p><u>to attach reasonable conditions to a certain consent. Other provisions which state conditions may be added to a consent include articles 20(3) (discharge of water) and 42(3)(a) (crown rights); however, other provisions which provide for consent are silent as to whether conditions can be added. Since there is no restriction on the imposition of conditions, SCC considers that can be added; however, for consistency and the avoidance of doubt, SCC considers each provision which provides for the grant of consent or approval should state explicitly that conditions may be attached to such consent or approval e. g. the following articles: 11(2) (street works), 14(4) (power to alter layout, etc. of streets), 16(2) (temporary closure of streets and public rights of way), 17(1)(b) (access to works), 22(5) (authority to survey and investigate the land), 49(2) (traffic regulation), and 50(4) (felling or lopping).</u></p>	
3.13.15	DCO wording	<p>National Grid refers to the justification already provided in Paragraph 3.38.1 of the Explanatory Memorandum [APP-057]:</p> <p><i>“When paired with the programme and nature and scale of the Project, National Grid is of the view that seven years is justified. A period of seven years is precedent in other Orders, including the East Anglia ONE North Offshore Windfarm Order 2022 and the East Anglia TWO Offshore Windfarm Order 2022. The Statement of Reasons (document</i></p>	<p>Article 34(1) (time limit for exercise of authority to acquire land and rights compulsorily) – SCC considers allowing the applicant seven years to issue ‘notices to treat’ or a ‘general vesting declaration’ to acquire the land or rights that is subject to the power of compulsory purchase is excessive. Five years is the usual position and SCC considers the usual position should be adopted here, especially since (per article 34(4)) that period will not be eaten into by any legal challenge to the decision to grant development consent for the project.</p>	

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		<u>reference 4.1) provides further details on compulsory acquisition and time limits.</u>		
<u>3.13.16</u>	<u>DCO wording</u>	National Grid acknowledges the rationale for this additional wording and will consider whether this drafting point can be included in the next updated version of the draft DCO.	Article 49(5) (traffic regulation) – this provision refers to the “instrument” made under paragraph (1), (2) or (3) of article 49. SCC considers it would be helpful if a copy of the made instrument were made available by the undertaker and sent to SCC. In the light of this, SCC would suggest a new article 49(13) to provide as follows – . “(13) A copy of the instrument referred to in paragraph (5) must be held at the registered office address of the undertaker for inspection during normal working hours and, as soon as reasonably practicable after being made, a copy must be served on the highway authority”.	
<u>3.13.17</u>	<u>DCO wording</u>	<p>a. National Grid refers to ES Appendix 8.3 - Hedgerows Regulations Report [APP-161], the conclusions of which directly informed the baseline for the assessment of effects on hedgerows, including important hedgerows, as reported in ES Chapter 8: Ecology and Biodiversity [APP-158].</p> <p>Table 8.23 in ES Chapter 8 records the conclusions of the assessment undertaken as follows:</p> <p><i>“Following the application of mitigation, it is concluded that there would be an overall negligible magnitude of impact with no significant residual effect on ‘Important’ hedgerows.”</i></p>	Article 50 (felling or lopping) – SCC is concerned that important hedgerows under the Hedgerow Regulations 1997 are included in this Article without any provision for special consideration to minimise impacts, for example by using HDD or coppicing and temporary storage prior to replanting, instead of removal. In any event, SCC notes the following from Advice Note Fifteen: drafting Development Consent Orders: “...the Article should include a Schedule and a plan to specifically identify the hedgerows to be removed (whether in whole or in part). This will allow the question of their removal to be examined in detail. Alternatively, the Article within the DCO could be drafted to include powers for general removal of hedgerows (if	

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		<p><u>The Outline Code of Construction Practice [APP-300] includes a commitment that following detailed design and prior to construction (of relevant parts of the Project), relevant surveys would be undertaken of arboricultural features that may be impacted or need to be removed to ensure any hedgerow removal is reduced as far as practicable</u></p> <p><u>b. The Trees and Hedgerows to be Removed and or Managed Plans [APP048 – APP055] identify the potential effect of the Project on all relevant trees and hedgerows, including important hedgerows, situated in proximity to the Order limits. It is noted that the impact upon individual hedgerows (i.e. those shown on the Plans as 'potentially affected', 'affected managed' or 'removed') could change depending on the final location of the Project within the LoD which National Grid is seeking consent for.</u></p> <p><u>c. National Grid notes that SCC intends to give further consideration to the drafting in Article 50(4) of the draft DCO [APP-056].</u></p>	<p><u>they cannot be specifically identified) but this must be subject to the later consent of the local authority" (paragraph 22. 1). 222. Regarding "a plan to specifically identify the hedgerows to be removed", while the applicant has prepared "trees and hedgerows to be removed and/or managed plans" it is not clear those plans apply to all hedgerows or important hedgerows to be removed and SCC would welcome clarification on this point. . 223. Regarding consent, only trees "within or overhanging the extent of the public highway" (and not included in the "trees and hedgerows to be removed and/or managed plans") are subject to consent. Depending on the confirmation received in respect of the point mentioned above, SCC might seek the amendment of this article to include a more general consent provision.</u></p>	
3.13.18	Requirements	<p><u>The definition of 'discharging authority' included in Schedule 3 to the draft DCO [APP-056] is deliberately drafted so as not to name specific authorities or bodies, noting the different geographies and authorities involved in the Project.</u></p>	<p><u>Schedule 3 (requirements) (paragraph 1 (interpretation)) – paragraph 1(1) defines "discharging authority" as "the body responsible for giving any consent, agreement or approval required by a requirement included in this Order ...". Requirement 4 (construction</u></p>	

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		<p><u>The adopted approach is well-precedented by other development consent orders.</u></p> <p><u>However, National Grid recognises that certainty is required by all parties over which bodies are defined as a discharging authority. National Grid will therefore seek to work with local authorities to consider further how responsibility for discharge of requirements between different bodies can be clarified.</u></p> <p><u>National Grid will also review the definitions used in the draft DCO to check whether any amendments can be made to ensure any greater clarity.</u></p>	<p><u>management plans) provides for the involvement of the "other discharging authority" in certain activities; however, it is not clear who that authority is. Requirements are the DCO equivalent of planning conditions (Section 120(2)(a) Planning Act 2008) and one of the six tests for conditions is precision (Circular 11/95: Use of conditions in planning permission (paragraph 14). SCC consider the inclusion of "discharging authority" in requirement 4 creates imprecision and requests that the applicant recasts requirement 4 so that the body they want to be involved in requirement 4 is named.</u></p>	
3.13.19	Requirements	<p><u>National Grid is unclear as to the precise amendment which SCC is seeking, noting that the wording included in Paragraph 1(4) of Schedule 3 to the draft DCO [APP-056] currently reads as follows:</u></p> <p><u>"Where an approval or agreement is required under the terms of any requirement or a document referred to in a requirement, or any requirement specifies "unless otherwise approved" or "unless otherwise agreed" by the relevant highway authority or the relevant planning authority, such approval or agreement may only be given where it has been demonstrated to the relevant highway authority or the relevant planning authority that the subject matter of the approval or agreement sought will not</u></p>	<p><u>Schedule 3 (requirements) (paragraph 1 (interpretation)) – paragraph 1(4) needs to be amended as follows – . "Where an approval or agreement is required under the terms of any requirement or a document referred to in a requirement, or any requirement specifies "unless otherwise approved" or "unless otherwise agreed" by the relevant highway authority or the relevant planning authority, such approval or agreement may only be given where it has been demonstrated to the satisfaction of the relevant highway authority or the relevant planning authority that the subject matter of the approval or agreement sought will not give rise to any materially new or materially different environmental effects from those identified in the Environmental Statement". . 226. This amendment is</u></p>	

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		<p><u>give rise to any materially new or materially different environmental effects from those identified in the Environmental Statement."</u></p>	<p><u>consistent with the drafting of the equivalent paragraph of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958).</u></p>	
3.13.20	Requirements	<p><u>National Grid notes that Requirement 3(1) requires written notice to be provided no less than seven days prior to the date on which the first pre-commencement operations are to be undertaken. National Grid notes that the obligation is to provide a notification only and, therefore, there is no requirement for the relevant authority to take any further action or other positive step(s) within those seven days.</u></p> <p><u>As a consequence, it is unclear what further utility would be served by increasing that period to 35 days.</u></p>	<p><u>Schedule 3 (requirements) (requirement 3(1) (stages of authorised development))</u> – requires that a written notice setting out the anticipated programme for the carrying out of pre-commencement operations must be given to the relevant planning authority no less than seven days prior to the date on which those pre-commencement operations are first carried out. This is included in the equivalent requirement of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958). SCC's experience of discharging requirements under that Order has shown the time period to be too short. In the light of this, SCC requests that the 7-day period is increased to 35 days.</p>	
3.13.21	Requirements	<p><u>National Grid acknowledges SCC's submission on this point and will consider whether revised drafting can be included in the next updated version of the draft DCO.</u></p>	<p><u>Schedule 3 (requirements) (requirement 3(2) and (3) (stages of authorised development))</u> – provides for notice of the commencement and completion of each stage to be given to the relevant planning authority within 28 days of the event occurring. SCC does not understand why it should take a month for this information to be provided and considers it should be provided in 5 working days.</p>	
3.13.22	Requirements	<p><u>National Grid acknowledges SCC's submission on this point and will amend</u></p>	<p><u>Schedule 3 (requirements) (requirement 6(2) (archaeology))</u> – this provision names</p>	

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		<p><u>references in Requirement 5 (Archaeology) from “relevant planning authority” to “relevant discharging authority”, noting that the latter is already separately defined in Paragraph 1(1) of Schedule 3 to the draft DCO [APP-056].</u></p>	<p><u>“the relevant planning authority” as the discharging authority. In Suffolk, SCC should be the discharging authority because archaeology is a county function. This approach is precedented. For instance, requirement 3 (project wide: archaeology and peat) of the Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853) names SCC as the approving authority for archaeological matters.</u></p>	
3.13.23	Requirements	<p><u>The working hours are secured through Requirement 7 of Schedule 3 of 3.1 Draft Development Consent Order [APP-056] (draft DCO).</u></p> <p><u>The construction works are largely linear and would not 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 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.</u></p> <p><u>The defined core working hours provides essential flexibility. Importantly, the core working hours permit, but do not require,</u></p>	<p><u>Schedule 3 (requirements) (requirement 7 (construction hours))</u> – this provision needs significant reworking in order to allow for community respite. For example, SCC considers Saturday hours should be between 08:00 and 13:00 and there should be no working on Sundays and Bank Holidays. The Secretary of State considered a similar approach appropriate in the East Anglia ONE North Offshore Wind Farm Order 2022 (S. I. 2022/432). Requirement 24 of that Order states the core hours are “between 0700 hours and 1900 hours Monday to Friday and 0700 hours and 1300 hours on Saturdays, with no activity on Sundays or bank holidays”, subject to certain exceptions listed in sub-paragraph (2). SCC’s proposed amendments to requirement 7 include the following.</p> <p><u>231. Requirement 7(1) should be amended as follows – “Subject to sub-paragraphs (2) to (5) work may only take place between the hours of 07. 00 and 19. 00 Monday to Friday and 08.</u></p>	

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		<p><u>working on Sundays and Bank Holidays. This flexibility is critical to maintaining programme resilience, allowing the 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.</u></p> <p><u>Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing 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, and the environment.</u></p> <p><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. Such a restriction</u></p>	<p><u>00 and 13.00 on Saturdays, unless otherwise approved by the relevant planning authority".</u></p> <p><u>232. 35. Requirement 7(2) should be amended as follows – "No percussive piling works may take place outside of the hours of 0700 to 1900 Monday to Friday and 08.00 to 13.00 on Saturdays, unless otherwise approved by the relevant planning authority".</u></p> <p><u>233. 36. Requirement 7(3) should be amended as follows – "Subject to sub-paragraphs (4) and (5), no HGV deliveries may be made to site outside of the hours of 0700 to 1900 Monday to Friday and 08.00 to 13.00 on Saturdays, unless otherwise approved by the relevant highway authority".</u></p> <p><u>234. 37. Requirement 7(4)(a) should be omitted.</u></p> <p><u>235. 38. Requirement 7(4)(g) is less detailed than the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024, which paragraph 4.3.5 of the EM [APP-057] cites as a precedent for the requirements. For example, requirement 7(3)(g) of the Bramford Order states – "(3) The following operations may take place outside the core working hours referred to in sub-paragraph (1)— . (g) the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities that the undertaker and its contractor agree forms the critical path for the accepted construction programme. In such cases, the undertaker must, as soon as practicable, notify the</u></p>	

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		<p><u>would also undermine the deliverability of this critical national priority project, where timely delivery is in the public interest. National Grid does not consider it justified to amend the core working hours. There are a number of instances within Requirement 7 that ensure the relevant authority's consent is sought to work outside of the core working hours. Beyond this, National Grid does not consider it to be practical to notify the relevant authorities, especially, for example, those that involve a continuation of works that began during core working hours.</u></p> <p><u>Requirement 7(4) of Schedule 3 of 3.1 draft DCO [APP-056] 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. Trenchless crossings may need to proceed without interruption to avoid safety, environmental, or asset integrity risks. Importantly, any activities undertaken outside core construction hours remain subject to the controls and mitigation measures set out in 7.2 Outline Code of Construction Practice [APP-300] (Outline CoCP). These controls include provisions relating to noise management, lighting,</u></p>	<p><u>relevant planning authority of the disruption or interruption and explain why that work could not be completed within the core working hours referred to in sub-paragraph (1)"; [Words not included in the dDCO shown underlined].</u></p> <p><u>236. SCC considers the bold and underlined text (which SCC requested should be included in the Bramford DCO) should be included in the dDCO.</u></p> <p><u>237. Requirement 7(5) is less detailed than the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024, which paragraph 4. 3. 5 of the EM [APP-057] cites as a precedent for the requirements. For example, requirement 7(4) of the Bramford Order states – . "The core working hours exclude start up and close down activities up to 1 hour either side of the core working hours. A 50dBA noise limit (LOAEL) will apply at the nearest noise-sensitive receptors for start-up and close down activities up to one hour either side of the core working hours".</u></p> <p><u>238. SCC considers the underlined text (which SCC requested should be included in the Bramford DCO) should be included in the dDCO.</u></p>	

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		<p><u>environmental protection and monitoring, ensuring that any out-of-hours activity is appropriately managed and minimised. The measures set out within 7.2 Outline CoCP [APP-300] will be secured via Requirement 4(1)(a) (Construction Management Plans) of 3.1 draft DCO [APP-056] within the final CoCP.</u></p> <p><u>There are no statutory noise limits for construction noise. However, works during any period would be subject to assessment against the applicable construction noise threshold for potential significant effects for that period, as per the 'ABC' method described in Annex E.3.2 of BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise, and as detailed in Section 4 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256].</u></p>		
3.13.24	Requirements	<p><u>National Grid has proposed a 5 year replacement period, the duration of which is consistent with recent National Grid DCOs including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.</u></p> <p><u>Five years is considered appropriate for the types of reinstatement and mitigation planting proposed for the Project. Planting</u></p>	<p><u>Schedule 3 (requirements) (requirement 9(3) (reinstatement planting scheme)) – this provision states – . “Any trees or hedgerows planted as part of an approved reinstatement planting plan that, within a period of five years after planting (or such other period as is specified in the landscape and ecological management plan approved pursuant to requirement 4), are removed, die or become in the opinion of the relevant planning authority seriously damaged or diseased, must be replaced in the first available planting season with a specimen of the same species and size</u></p>	

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		<p><u>sizes and species have been selected based on those that would naturalise more easily than larger tree stock.</u></p>	<p><u>as that originally planted, unless otherwise approved by the relevant planning authority".</u> <u>240. The reference to "5 years" should be changed to "10 years", which would provide greater ecological improvements.</u></p>	
3.13.25	<p><u>Schedule wording</u></p>	<p><u>National Grid acknowledges these comments.</u> <u>However, National Grid considers that the time limits included within Schedule 4 to the draft DCO [APP-056] are necessary and proportionate and have been deemed acceptable by the Secretary of State on previous National Grid DCOs, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) 2024.</u> <u>It is noted that there is already scope within Paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) to extend the 28 day period for the discharge of Requirements by agreement in writing between the undertaker and the relevant authority.</u> <u>In any case, National Grid will nevertheless negotiate Planning Performance Agreements as necessary and at the appropriate time, to ensure SCC, and other relevant host authorities, are able to respond on programme.</u></p>	<p><u>Schedule 4 (discharge of requirements) (paragraph 1, timescales)</u> – the timescales in Schedule 4 are too short and should be changed so that they are, at the very least, no shorter than those set out in Advice Note Fifteen: drafting Development Consent Orders. <u>The EM [APP-057] justifies the shorter timescales as follows –. "Whilst it is acknowledged that the time limits included in Schedule 4 (in relation to the determination of applications made pursuant to the Requirements and any requests made by the relevant discharging authority for further information) do differ from those recommended in Advice Note 15, National Grid considers that shorter time limits are necessary and proportionate in light of the immediate and pressing national need which the project is intended to address. There is precedent for these time frames in the recently made National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024". (paragraph 4. 4. 2).</u> <u>242. This argument is unconvincing. The 28-day decision-making period in paragraph 1(1) of Schedule 4 (compared to the 42-day period in paragraph 1(2) of Appendix 1 to Advice Note Fifteen) is unlikely to affect "the</u></p>	

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
			<p><u>immediate and pressing national need which the project is intended to address".</u></p> <p><u>243. While SCC will ensure that any request for approval will be dealt with as quickly as possible, it will be remembered that SCC will be receiving a considerable number of requests for approval across several nationally significant infrastructure projects. A 42-day decision-making period would be challenging in this context; the reduction of the timeframe to 28 days is unrealistic and potentially detrimental to the effective consideration of requests. Owing to these circumstances, the Councils consider a 56-day decision-making period would be reasonable.</u></p> <p><u>244. Paragraph 4. 4. 3 of the EM [APP-057] says this schedule is "identical to the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024". It is not. The equivalent period in the Bramford Order is 35 days. SCC's experience of determining applications for the discharge of requirements for that Order have shown that 35 days is insufficient. More time, not less, is required here.</u></p>	
3.13.26	<u>Schedule wording</u>	<p><u>National Grid acknowledges SCC's submission and will submit revised drafting which reflects the extant national fee schedule applicable to the discharge of planning conditions.</u></p> <p><u>However, it is not clear to National Grid on what basis SCC consider the refund mechanism in Paragraph 3(2) to be</u></p>	<p><u>Schedule 4 (discharge of requirements) (paragraph 3, fees)</u> – the fees proposed in paragraph 3(1) are unreasonably low and need to be increased. Moreover, paragraph 3(2) – which provides for the refund of fees in certain circumstances – is unreasonable and should be deleted.</p>	

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		<u>unreasonable. It would be helpful if SCC could further clarify its concerns on this point.</u>		
<u>3.13.27</u>	<u>Schedule wording</u>	<u>National Grid acknowledges SCC's submissions in respect of Part 3 of Schedule 16 and similarly in respect of Schedule 17. National Grid would welcome engagement with SCC on both points in order to better understand SCC's specific concerns.</u>	<u>Schedule 17 (public general legislation) – the disapplication of section 23 of the Land Drainage Act is not agreed, and neither are the protective provisions included at Part 3 (for the protection of drainage and flood authorities) of Schedule 16 (protective provisions) to the dDCO.</u>	
<u>3.13.26</u>	<u>Schedule wording</u>	<u>National Grid notes that the local legislation referenced in Schedule 18 to the draft DCO [APP-056] is a matter of existing public record and would, therefore, respectfully direct SCC to the relevant legislative databases.</u>	<u>Schedule 18 (amendment of local legislation) – SCC requests copies of the Acts which affect their administrative area.</u>	
<u>Other matters as required</u>				

3.14 Other Matters

4. Confirmation of Agreement

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

Signed for and on behalf of National Grid:

.....

Date:

.....

Signed for and on behalf of Suffolk 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
MSBDC	Mid Suffolk and Babergh District Council
NCR	National Cycle Route
NETS	National Electricity Transmission System
NPSs	National Policy Statements
PARS	Primary Access Routes
PEIR	Preliminary Environmental Information Report
PRoW	Public Right of Way
SoCG	Statement of Common Ground
SoCC	Statement of Community Consultation
SPZ	Source Protection Zone
SCC	Suffolk County Council
WFD	Water Framework Directive
WSI	Written Scheme of Investigation

Abbreviation	Full Reference
Zol	Zone of Influence
ZTV	Zone of Theoretical Visibility

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