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nationalgrid

# Contents


| | | |
|---|---|---|
| **1.** | **Introduction** | **1** |
| 1.1 | Overview | 1 |
| 1.2 | Signposting for Compliance with NPS EN-1 (January 2026) | 25 |
| 1.3 | Signposting for Compliance with NPS EN-5 (January 2026) | 248 |
| 1.4 | Signposting for Compliance with NPS EN-3 (January 2026) | 311 |
| 1.5 | Signposting for Compliance with National Planning Policy Framework (NPPF) (Consultation Draft December 2025) | 313 |
| 1.6 | Signposting for how the Project has had regard to Local Planning Policy (Plans Adopted since 1 April 2025 and those emerging plans) | 379 |
| 1.7 | Signposting for how the Project has had regard to Neighbourhood Plans (Emerging and Adopted Plans post 1 April 2025) | 508 |

| | | |
|---|---|---|
| Table 1.1 | EN-1 Policy Context | 5 |
| Table 1.2 | Government Policy on Energy Infrastructure Development | 6 |
| Table 1.3 | The Need for New Nationally Significant Infrastructure | 7 |
| Table 1.4 | Assessment Principles | 9 |
| Table 1.5 | CNP Presumption in Favour of Consent (EN-1 Section 4.2) | 11 |
| Table 1.6 | Construction and Operational Management | 13 |
| Table 1.7 | Electricity Networks Specific Provisions (EN-5) | 15 |
| Table 1.8 | Signposting for Compliance with EN-1 | 25 |
| Table 1.9 | Signposting for Compliance with EN-5 | 248 |
| Table 1.10 | Signposting for Compliance with EN-3 | 311 |
| Table 1.11 | Signposting for Compliance with Consultation Draft NPPF (December 2025) | 313 |
| Table 1.12 | Signposting of policy wording of relevant local plan policy | 379 |
| Table 1.13 | Signposting with Neighbourhood Plan Policy | 508 |

| | |
|---|---|
| Abbreviations | 540 |
| Glossary | 542 |
| Bibliography | 551 |

# 1. Introduction

## 1.1 Overview

1.1.1 In the application for development consent, National Grid prepared and submitted **5.7 Policy Compliance Document [APP-086]**. The Policy Compliance Document was prepared in compliance with Regulation 5(2)(q) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations') which requires '*any other documents considered necessary to support the application*'. The Policy Compliance Document provided an assessment of the Project's strategic alignment and conformity with the following policy documents

- The Project's conformity with **Overarching National Policy Statement for Energy [EN-1]** (Department for Energy Security and Net Zero, 2024a)
- The Project's conformity with **National Policy Statement for Electricity Networks Infrastructure [EN-5]** (Department for Energy Security and Net Zero, 2024b)
- The Project's conformity with **National Policy Statement for Renewable Energy Infrastructure [EN-3]** (Department for Energy Security and Net Zero, 2024c)

1.1.2 The Policy Compliance Document also set out how the Project is in general accordance with the National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government 2024), relevant adopted local planning and neighbourhood plan policies.

1.1.3 The **Policy Compliance Document [APP-086]** includes an assessment of the Project against relevant National Policy Statements (NPSs), National Planning Policy Framework (NPPF) and local development plan policies which were in place on or before 1 April 2025.

1.1.4 The Policy Compliance Document contains the assessment of the Project against the NPSs which were government policy at the time of submission. These NPSs form the primary basis to the determination of the application for development consent.

1.1.5 Since submission of the application, a number of relevant planning policy documents have been updated and/or brought into force.

1.1.6 In the Rule 6 Letter, the Examining Authority notes that the suite of energy NPSs have been recently updated. Whilst the transition provisions set out in Section 1.6 (page 12) of NPS EN-1 (December 2025) apply to the application as it was accepted prior to the publication of the revised policy, the Examining Authority confirmed that the updated NPSs are capable of being important and relevant considerations in the decision-making process.

1.1.7 In addition, the Government is consulting on a revised draft NPPF (consultation is taking place between 19 December 2025 until 10 March 2026). It is considered by National Grid that the draft NPPF is potentially capable of being an important and relevant consideration in the decision-making process albeit at this stage being of more limited weight. The Applicant will monitor progression of the draft NPPF through

the Examination and the decision timeline and update further as appropriate. The Examining Authority has requested National Grid to provide:

- An NPS Tracker, which sets out the changes/modifications to any relevant updated NPS
- A tracker related to any other new government policy intentions for energy and critical energy infrastructure that are not addressed within the NPSs
- Updates in regard to the draft NPPF (published December 2025), as the ExA considers them to be relevant to the Project, as it progresses through consultation towards formal publication.

1.1.8 In addition, the Examining Authority also requested a tracker on any National Development Management Policies (NDMP) and development plan documents published for consultation or adopted as National Grid considers them to be relevant to the Project.

1.1.9 This Planning Policy Compliance Tracker is an addendum to the **Policy Compliance Document [APP-086]**. The Policy Compliance Tracker provides an assessment of emerging and adopted policy issued since 1 April 2025 up to 13 February 2026. This Policy Compliance Tracker incorporates an assessment of the Project against the following policy documents:

- Overarching National Policy Statement for Energy (EN-1) (DESNZ, 2026a)
- National Policy Statement for Electricity Networks Infrastructure (EN-5) (DESNZ, 2026b)
- National Policy Statement for Renewable Energy Infrastructure (EN-3) (DESNZ, 2026c)

1.1.10 The above National Policy Statements were published in December 2025 and came into force in 2026.

1.1.11 The updates between the 2024 and 2026 versions of the NPSs considered to be of relevance to the Project are presented for ease of reference in tracked changes in Tables 1.8 to 1.10. Tables 1.1 to 1.7 provide a high-level comparison on the key changes introduced in the 2026 NPs. The following policy documents are presented as new insertions to the compliance tracker:

- NPPF Consultation Draft (December 2025)
- Adopted Norfolk Minerals and Waste Local Plan 2023-2038 Adopted May 2025
- Essex Draft Replacement Minerals Local Plan (2024) (whilst this was published prior to 1 April 2025, the identification of potential mineral sites was a topic for consideration in the **Planning Statement [APP-085]** rather than the **Policy Compliance Document [APP-086]**.
- Colchester Preferred Options Local Plan Regulation 18 Consultation (November 2025)
- Tendring Local Plan Review 2025 – 2042 and Beyond Preferred Options: Regulation 18 Consultation (February 2026) Chelmsford Local Plan Pre-Submission (Regulation 19) Document February 2025 (presented in tracked changes)
- Basildon Local Plan Regulation 18 Consultation Part 3 (November 2025)

- Thurrock Local Plan: Initial Proposals Document (Regulation 18 Consultation) (2023) (whilst this was published prior to 1 April 2025, the identification of potential housing and employment sites was a topic for consideration in the Planning Statement **[APP-085]** rather than the **Policy Compliance Document [APP-086]**.

1.1.12 The following Neighbourhood Plans which directly interact with the Project have also been published or adopted since 1 April 2025.

- Draft Swainsthorpe Neighbourhood Plan (published for consultation 2 December 2025)
- Newton Flotman Neighbourhood Plan (Adopted October 2025)
- Hintlesham & Chattisham Neighbourhood Plan (Adopted August 2025)
- Copdock & Washbrook Neighbourhood Plan (Adopted August 2025)

1.1.13 The Policy Compliance Tracker will be updated at Deadline 4 and Deadline 7 (where required) to capture any updates to planning policy from 13th February 2026.

1.1.14 The Policy Compliance Tracker also include a commentary on the following:

- National Development Management Policies
- Transitional Regional Energy Strategy Plan (tRESP)
- Dedham Vale National Landscape and Stour Valley Project Area Management Plan (2026-2031)

## Energy National Policy Statements (2026)

1.1.15 In April 2025, the government launched a consultation on proposed changes to EN-1, EN-3 and EN-5 that ended on 29 May 2025. The updated NPSs were subsequently published in November 2025 and came into force on 6 January 2026.

1.1.16 Paragraphs 1.6.2 and 1.6.3 of NPS EN-1 (2026) describe the transitional arrangements

'*The 2024 NPSs included transitional provisions between the 2011 and 2024 NPS which remain in place. The Secretary of State has decided that similar transition provisions should apply for the 2025 NPSs, so that for any application accepted for examination before the final publication of the approved 2025 amendments, the 2024 suite of NPSs should have effect in accordance with the terms of those NPSs*.'

1.1.17 Paragraph 1.6.3 describes how the 2026 amendments will therefore have effect only in relation to those applications for development consent accepted for examination after the final publication of those amendments.

1.1.18 At the point of submission of the Project, the NPSs designated in January 2024 were government policy., The updated NPSs are important and carry weight in the decision-making process.

1.1.19 An assessment of the Project against the 2026 NPSs EN-1, EN-5 and EN-3 is presented in this tracker. The updates to the NPSs have been presented in tracked changes from the 2024 iterations which form the policy basis for the assessment of the Project.

1.1.20 The 2026 EN-1 and EN-5 now set out the government's commitment to the Clean Power Action Plan 2030, which aims for at least 95% of the UK's electricity generation to come from clean sources by 2030 and emphasises the urgency and critical national priority (CNP) of developing low-carbon infrastructure, thereby supporting the need case established in the ES.

1.1.21 The 2026 EN-1 and EN-5 maintain the assessment principles and generic impact considerations outlined in the 2024 EN-1 and EN-5, ensuring continuity in evaluating environmental effects. They also introduce enhanced guidance on biodiversity, flood risk, and climate resilience and the mitigation hierarchy. The ES is in compliance with these 2026 NPSs.

1.1.22 The following tables (Table 1.1 to Table 1.7 (inclusive)) present a high-level review of compliance of the Project against the key policy themes in the Overarching National Policy Statement for Energy (EN-1) and EN-5. The tables present an update to the assessment included in the **Planning Statement [APP-085]** which demonstrated how the Project was in accordance with the then emerging draft NPS EN-1. The tables below present:

- Key policy themes from the NPSs designated at the point of submission (NPS-EN1 and NPS EN-5 (2024))
- A summary of the policy evolution from the from the 2024 NPS EN-1 and EN-5 and highlights key material changes made between the April 2025 consultation draft and the December 2025 final version laid before Parliament. Key changes between the consultation draft NPS and the version which came into force in January 2026 are identified in the tables below.
- A summary of how the Project is compliance with those key policy changes.

1.1.23 A detailed assessment of the Project against the individual policies EN-1, EN-5 and EN-3 is included in Table 1.8 to 1.10 (inclusive).

Table 1.1 EN-1 Policy Context

| Theme | NPS EN-1 (DESNZ, 2024a) | Draft NPS EN-1 (2025a) | NPS EN-1 (DESNZ, 2026a) | Project Compliance |
|---|---|---|---|---|
| **Policy Context** | Sets out the legislation underpinning Net Zero by 2050 as per 2019 legislation (the Climate Change Act 2008 (2050 Target Amendment) Order 2019) and established the framework for ongoing updates. | Introduces the Clean Power 2030 Action Plan, as one of the five missions set out by the government, with a transition for power sector decarbonisation as a prelude to 2050 net zero and the explicit definition of the Clean Power 2030 Action Plan. | Government response clarifies targets/milestones in Clean Power 2030 Action Plan, rather than policy ceilings around specific capacities, to avoid constraining approvals. Language now emphasises "at least 95% clean electricity by 2030" without numeric technology ranges in policy text. | Project remains directly aligned because the Project has a key role in enabling renewable deployment regardless of technology mix within Clean Power 2030 framework. |
| **Primary Policy Document** | Establishes the NPS as the primary basis for Secretary of State decisions, in conjunction with relevant technology-specific NPS. Noting that where there are | Takes the same position, but emphasises the need for consideration of new spatial planning tools (e.g., Strategic Spatial Energy Plan, Centralised Strategic Network | **CHANGE:** Additional text added to clarify interplay between CSNP and SSEP and reference to emerging Electricity Transmission Design Principles (ETDP). | Project sits within CSNP (NESO Pathway to 2030 HND); alignment strengthened by clarified strategic planning language. |

| Theme | NPS EN-1 (DESNZ, 2024a) | Draft NPS EN-1 (2025a) | NPS EN-1 (DESNZ, 2026a) | Project Compliance |
|---|---|---|---|---|
| | no technology specific NPSs, EN1 shall be the primary policy guidance document. | Plan) and more frequent updating. | Minor clarifications to improve reader understanding of strategic planning framework interaction. | |

Table 1.2 Government Policy on Energy Infrastructure Development

| Theme | NPS EN-1 (DESNZ, 2024a) | Draft NPS EN-1 (2025a) | NPS EN-1 (DESNZ, 2026a) | Project Compliance |
|---|---|---|---|---|
| **Net Zero Legal Framework & Targets** | Sets out the target to achieve net zero by 2050 with 68% greenhouse gas reduction by 2030, the sixth carbon budget – CB6 (greenhouse gas reduction by 78% compared to 1990 levels) by 2035 and references Net Zero Strategy and the British Energy Security Strategy. | Introduces the Clean Power Action Plan 2030 as a Statutory intermediate delivery step towards net zero by 2050. States that by 2030, at least 95% of GB generation should come from clean sources, with capacity targets for offshore wind (43-50GW), onshore wind (27-29GW), solar (45-47GW). | **CHANGE**: Capacity targets now positioned as Clean Power 2030 Action Plan figures rather than NPS policy statements. Footnote 32 explains government view that ranges are milestones/targets, not ceilings, to avoid implying cap on renewable deployment. | Project supports acceleration toward 95% clean electricity 2030 target and net zero 2050. Revised emphasis does not impact on the case for the Project's necessity – Project remains essential to facilitate rapid renewable deployment. |
| **Policy Emphasis** | Balances decarbonisation, energy security, affordability across multiple strategies. | Maintains those policies and drivers set out previously, but with greater emphasis on driving the 'mission' for clean energy, and sees 2030 as the clean power milestone as critical in the wider net zero trajectory set out by government.<br>Specifically cites that meeting the Clean Power 2030 Action Plan's objectives will require a 'step change' in the rate of | **CHANGE:** Phrasing on step change and pace maintained; no substantive shift but minor text refinement for clarity. | Project directly delivers step change in transmission capacity needed to enable Clean Power 2030 mission as new generation sources come online. |

| Theme | NPS EN-1 (DESNZ, 2024a) | Draft NPS EN-1 (2025a) | NPS EN-1 (DESNZ, 2026a) | Project Compliance |
|---|---|---|---|---|
| | | low carbon generation, flexibility infrastructure and electricity transmission infrastructure, stating 'We need to rapidly increase deployment of all relevant infrastructure to meet ……. capacity ranges and decarbonise the power sector.' | | |

Table 1.3 The Need for New Nationally Significant Infrastructure

| Theme | NPS EN-1 (DESNZ, 2024a) | Draft NPS EN-1 (2025a) | NPS EN-1 (DESNZ, 2026a) | Project Compliance |
|---|---|---|---|---|
| **Urgency and Scale** | States that the need for large quantities of new power infrastructure is urgent because demand is likely to double by 2050; electricity to dominate as heating/transport sectors electrify. | Continues to support the policies set out previously but places greater emphasis on the urgency and scale of progress required, particularly citing the 2030 clean power mission and explicit 'clean power capacity ranges' for each major technology; supports the acceleration of developments necessary to deliver cleaner generation and transmission of power, enhancing diversity and flexibility, reiterating that the pace and emphasis of the development of the technologies will be market led. | **CHANGE:** Emphasis on urgency and pace retained; capacity ranges moved from NPS policy to Clean Power 2030 Action Plan context. No change to underlying urgency narrative. | Project addresses critical need for transmission reinforcement at pace required by Clean Power 2030 timeline. Urgency narrative unchanged. There is a shift of emphasis towards the Clean Power 2030 Action Plan and thereafter, net zero. |

| Theme | NPS EN-1 (DESNZ, 2024a) | Draft NPS EN-1 (2025a) | NPS EN-1 (DESNZ, 2026a) | Project Compliance |
|---|---|---|---|---|
| **Grid and Networks** | States clearly and unequivocally that there is a need for reinforcement and expansion of grid and onshore/offshore transmission is urgent; coordination increasingly emphasised. | There is a greater policy weight for transmission and coordinated grid planning (e.g., strategic network plans, the Centralised Strategic Network Plan (CSNP), and further emphasises the need for rapid expansion and introduction of new infrastructure including generation, storage, interconnectors and electricity networks, stating that all of these aspects of energy infrastructure upgrades are necessary to meet the government's stated objectives for 2030 and 2050. The document sets out a strong presumption in favour of grid reinforcements and network projects, noting that there will be a need for 'reinforcement of the onshore transmission network to accommodate the increased power flows to regional demand centres'. | **CHANGE:** CSNP endorsement amended to "improve clarity"; now explicitly refers to interaction with SSEP and emerging ETDP (Electricity Transmission Design Principles). Offshore wind coordination changed from "encouraged" to "required." | Project directly addresses reinforcement of onshore transmission network in East Anglia identified in CSNP. Strengthened coordination language reinforces Project's strategic necessity. |

Table 1.4 Assessment Principles

| Theme | NPS EN-1 (DESNZ, 2024a) | Draft NPS EN-1 (2025a) | NPS EN-1 (DESNZ, 2026a) | Project Compliance |
|---|---|---|---|---|
| **Critical National Priority (CNP) Status** | Introduces concept of Crtical National Priority infrastructure. | All power lines in scope of EN-5 (including network reinforcements and associated substations) designated as CNP. Where residual non-HRA/MCZ impacts remain after mitigation hierarchy applied, these are "unlikely to outweigh urgent need." | CHANGE: CNP definition maintained; minor clarificatory text added in response to consultation concerns. Emphasis added on: (1) CNP sits within Planning Act 2008 framework (does not disapply impact assessment/EIA); (2) presumption is balanced against environmental/community impacts, not automatic consent; (3) proportionality, readiness, and adaptive management in EIA approach. | **Project qualifies explicitly as CNP infrastructure under final EN-1**. 400 kV transmission lines reinforcement with associated substations fall squarely within CNP scope. Clarificatory text does not change Project's qualifying status or policy weight afforded to CNP infrastructure. |
| **Mitigation Hierarchy** | Applicants must assess impacts and show how negative effects avoided, reduced, mitigated or compensated following mitigation hierarchy. | Same requirement; reinforced by CNP policy noting residual impacts "unlikely to outweigh need" once hierarchy applied. | **CHANGE:** Additional emphasis added on proportionality and adaptive management in environmental assessment; reinforces expectation of high-quality, front-loaded applications ready for examination. | Project demonstrates comprehensive application of mitigation hierarchy through embedded mitigation (undergrounding, design optimisation), standard mitigation (CoCP, environmental commitments), and compensation (10%+ BNG). |
| **Irreplaceable Habitats** | Policy that development should be avoided in irreplaceable habitats | Same policy; reinforced in context of CNP assessment noting impacts on | **CHANGE:** Strengthened language specifically addressing peatlands and | Project avoids significant peatland impacts through routeing optimisation (Limits |

| Theme | NPS EN-1 (DESNZ, 2024a) | Draft NPS EN-1 (2025a) | NPS EN-1 (DESNZ, 2026a) | Project Compliance |
|---|---|---|---|---|
| | (ancient woodland, veteran trees, hedgerows, peatland, blanket bog, lowland fen, etc.); exceptional circumstances only if justified. | irreplaceable habitats require case under HRA/MCZ framework. | blanket bog. Final text explicitly references "peat" and "peatlands" and emphasises that irreplaceable habitat status applies regardless of degradation status. Language mirrors NPPF updates emphasizing peat protection. Consultation responses flagged peat protections and final version delivers enhanced specificity. | of Deviation). Where minor unavoidable impacts occur, these are exceptional circumstances justified through CNP policy and IROPI (Imperative Reasons of Overriding Public Interest). Peat survey and mitigation protocols secured in CoCP. |
| **Biodiversity Net Gain (BNG)** | References emerging BNG requirements under Environment Act 2021. | Strengthens BNG language noting government commitment to improving environmental outcomes; calls for clear demonstration of at least 10% BNG. | CHANGE: BNG language slightly expanded to reference "nature recovery" alongside net gain; no change to 10% requirement or calculation methodology. Reflects Environment Act 2021 statutory framework. | Project commits to minimum 10% BNG. Methodology complies with Environment Act 2021 and EN-1 requirements. |
| **Circular Economy and Waste Minimization** | Generic reference to sustainable resource use and waste management. | Same; no specific circular economy language added. | CHANGE: New references added to circular economy and waste minimization principles (not present in consultation draft). Final version emphasises applicants should consider circular economy and waste reduction in supply chain, construction, and decommissioning phases. | Project design and construction planning incorporate circular economy principles: supplier engagement, material reuse protocols, waste minimisation targets aligned with net zero construction by 2025/26 commitment. Decommissioning protocols |

| Theme | NPS EN-1 (DESNZ, 2024a) | Draft NPS EN-1 (2025a) | NPS EN-1 (DESNZ, 2026a) | Project Compliance |
|---|---|---|---|---|
| | | | | include material recovery/recycling. |
| **Proportionality and Readiness** | General expectation of high-quality applications. | Increasing emphasis on early engagement, collaborative working with LPAs, proportionality in assessment. | CHANGE: Further emphasis in final version on: (1) proportionality in environmental assessment (avoiding over-assessment or unnecessary detail); (2) "readiness" expectation (applications should be comprehensive, with issues worked through before submission); (3) adaptive management approach post-consent allowing refinement of mitigation based on detailed design/environmental monitoring. | Project submitted following 12+ years of strategic planning work (NESO/CSNP process, Ofgem regulatory approval, extensive pre-application consultation). Application demonstrates proportionate, comprehensive assessment; adaptive management protocols secured in CoCP and Environmental Commitments Register. |

Table 1.5 CNP Presumption in Favour of Consent (EN-1 Section 4.2)

| Theme | NPS EN-1 (DESNZ, 2024a) | Draft NPS EN-1 (2025a) | NPS EN-1 (DESNZ, 2026a) | Project Compliance |
|---|---|---|---|---|
| **Presumption Framework** | Introduces elevated presumption for CNP infrastructure. Where applicant demonstrates residual environmental impacts acceptable and no unacceptable risks (human health, public safety, overriding considerations), Secretary of State "should | Continues to support the policies set out previously but places greater emphasis on the urgency and scale of progress required, particularly citing the Clean Power 2030 Mission and explicit 'Clean Power Capacity' ranges for each major technology; supports | Presumption framework retained in final version; additional text confirms that: (1) presumption sits within Planning Act 2008 framework (does not disapply statutory duties or statutory consultee input); (2) presumption is "balanced" against | Project qualifies for elevated CNP presumption. Analysis demonstrates: residual impacts minimised through mitigation hierarchy (avoidance, reduction, mitigation, compensation); no unacceptable health/safety risks identified; security of supply enhanced |

| Theme | NPS EN-1 (DESNZ, 2024a) | Draft NPS EN-1 (2025a) | NPS EN-1 (DESNZ, 2026a) | Project Compliance |
|---|---|---|---|---|
| | presume in favour of consent." Residual impacts "unlikely to outweigh urgent need." | the acceleration of developments necessary to deliver cleaner generation and transmission of power, enhancing diversity and flexibility, reiterating that the pace and emphasis of the development of the technologies will be market led. | environmental/community impacts (not automatic approval); (3) applicants must demonstrate genuine compliance with mitigation hierarchy and impact acceptability; (4) thresholds for "unacceptable risk" narrowly defined (human health/safety, security of supply, overriding national interest). | (not compromised); net positive social/economic outcomes. Presumption therefore favours consent subject to final SoS determination. |
| **Residual Impacts Test** | Introduces the CNP for low carbon infrastructure for the provision of nationally significant low carbon infrastructure.<br>In determining the application the Secretary of State will need to consider the particular circumstances of an application, but will take as a starting point for decision making where non-Habitats Regulations residual impacts remain that such infrastructure is to be treated as if it has met any test requiring a clear outweighing of harm, exceptionally, or very special circumstances within NPS EN-1, NPS EN-5 (DESNZ, | Where residual non-HRA/MCZ impacts remain after mitigation hierarchy applied, these are "unlikely to outweigh" urgent need for CNP infrastructure. Specific exceptions: human health/public safety, irreplaceable habitats requiring exceptional justification, critical navigation/flood risk. | **CHANGE:** Test maintained in final version; additional clarification confirms "unlikely to outweigh" applies to impacts that cannot be fully mitigated/avoided. Emphasis on: (1) thresholds for exceptional circumstances are high; (2) irreplaceable habitats require case under Habitats Regulations (IROPI); (3) proportionality principle applies—assessment must be proportionate to sensitivity/likely effects, not over-precautionary. | Project assessed against residual impacts test. Landscape/visual: minor residual impacts remain post-mitigation (some visibility of overhead lines in sensitive areas); however, CNP policy indicates these unlikely to outweigh urgent need for grid reinforcement. Biodiversity: no significant residual impacts anticipated post-mitigation and BNG compensation. Historic environment: no irreplaceable heritage assets wholly lost; impacts mitigated and recorded. Therefore, no threshold barriers to presumption in favour apply. |

| Theme | NPS EN-1 (DESNZ, 2024a) | Draft NPS EN-1 (2025a) | NPS EN-1 (DESNZ, 2026a) | Project Compliance |
|---|---|---|---|---|
| | 2024b) or any other planning policy. | | | |
| **Habitats Regulations Assessment (HRA) / Marine Conservation Zones (MCZ)** | Standard HRA/MCZ framework applies; potential for adverse effects on European Sites requires mitigation/compensation. | Same framework; clarifies that adverse effects on European Sites must be assessed, but where CNP status and IROPI demonstrated, derogation may be justified. | CHANGE: HRA/MCZ language unchanged in substance; however, final version adds emphasis on: (1) CNP status and urgent need can constitute IROPI justification (where alternatives ruled out and no better alternatives exist); (2) compensatory measures must be delivered and secured; (3) case must be robust and exceptional (reflecting high threshold for IROPI). Government response confirms CNP does not disapply HRA but provides policy context for IROPI justification where required. | Project's HRA will assess effects on European Sites (if any identified). Where adverse effects cannot be avoided/mitigated, IROPI case will be justified by: (1) CNP status (electricity transmission reinforcement for Clean Power 2030); (2) urgent national need (grid bottleneck constraint on renewable deployment); (3) lack of alternatives (routeing optimisation via Limits of Deviation tested all practicable alternatives); (4) compensatory measures (off-site habitat creation, species mitigation). This approach now explicitly supported by final EN-1 language. |

Table 1.6 Construction and Operational Management

| Theme | NPS EN-1 (DESNZ, 2024a) | Draft NPS EN-1 (2025a) | NPS EN-1 (DESNZ, 2026a) | Project Compliance |
|---|---|---|---|---|
| **Code of Construction Practice (CoCP)** | Applicants should prepare CoCP addressing construction impacts (traffic, noise, dust, etc.). | Strengthens expectation; CoCP should be comprehensive, front-loaded, and proportionate; should address all relevant | **CHANGE**: Final version adds emphasis on "proportionality" (CoCP should match sensitivity of location and significance of | Project's Outline CoCP (evolving to detailed CoCP) addresses all relevant impacts proportionately. Adaptive management |

| Theme | NPS EN-1 (DESNZ, 2024a) | Draft NPS EN-1 (2025a) | NPS EN-1 (DESNZ, 2026a) | Project Compliance |
|---|---|---|---|---|
| | | receptors and embed mitigation. | likely effects; over-specification not required) and "adaptive management" (CoCP should allow for refinement as detailed design develops and site conditions understood). | protocols allow for refinement based on detailed survey data and site conditions; Environmental Commitments Register provides mechanism for post-consent tracking and updates. |
| **Environmental Commitments Register** | Generic requirement for applicants to track mitigation commitments. | Strengthened expectation; Register should be detailed, comprehensive, and linked to conditions/requirements imposed. | **CHANGE:** Final version adds expectation that Register be "living document" capable of updates/refinement during detailed design and construction phases, subject to appropriate change control procedures. | Project's Environmental Commitments Register is detailed, comprehensive, and includes protocols for updating during detailed design, construction, and operation. All mitigation measures traceable to register entry and associated conditions/requirements. |
| **Circular Economy and Net Zero Construction** | Limited guidance; generic sustainability expectations. | Same; no specific circular economy language in consultation draft. | **CHANGE:** New references added (not in consultation draft) requiring consideration of: (1) supply chain sustainability and circular economy principles (material sourcing, reuse, recycling); (2) net zero construction pathways; (3) waste minimization and site waste management; (4) decommissioning planning and material recovery. | Project's construction strategy incorporates circular economy principles throughout supply chain engagement. Net zero construction target of 2025/26 integrated into delivery plan; detailed waste management and material recovery protocols secured in CoCP. Decommissioning strategy includes material recovery and recycling provisions. |

Table 1.7 Electricity Networks Specific Provisions (EN-5)

| Theme | NPS EN-5 (DESNZ, 2024a) | Draft NPS EN-1 (2025a) | NPS EN-5 (DESNZ, 2026b) | Project Compliance |
|---|---|---|---|---|
| **Transmission Network Reinforcement as CNP** | Supports need for transmission reinforcement; encourages coordination of offshore wind and associated transmission infrastructure. | Elevates transmission reinforcement to CNP status; coordination "encouraged" for offshore wind + transmission integration. | **CHANGE:** Offshore wind coordination moved from "encouraged" to "required" (stronger language). CSNP endorsement clarified to explain interaction with SSEP and emerging ETDP. Peat-specific language added (particularly in context of onshore wind sections now reintroduced). | Project represents direct response to requirement for coordinated offshore wind + transmission deployment. Coordination with existing and planned renewable generation in East Anglia embedded in Project design and strategic planning rationale (NESO HND). |
| **Landscape and Visual Impacts** | Guidance on assessment of impacts on designated landscapes; undergrounding encouraged in sensitive areas (National Landscapes, AONBs, etc.). | Retained; applied in context of CNP assessment noting landscape impacts unlikely to outweigh urgent need once mitigation applied. | **CHANGE:** Enhanced guidance specifically on peatlands in context of onshore wind (following reintroduction of onshore wind to NSIP regime); no change to transmission landscape policy. | Project incorporates extensive undergrounding through designated landscapes (Dedham Vale National Landscape and sensitive areas); LVIA demonstrates compliance with landscape-led design principles. |
| **Onshore Wind Reintroduction** | Onshore wind below 100MW not within NSIP regime (post-2015). | Consultation draft notes forthcoming reintroduction at 100MW threshold (Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025, effective 31 December 2025). | **CHANGE:** Final EN-5 reflects reintroduction of onshore wind to NSIP regime at 100MW threshold for England and 100MW+ in Wales. Enhanced peat and landscape guidance added specific to onshore wind section. Solar threshold updated to 100MW. | Not directly applicable to 400 kV transmission project, but context clarifies government commitment to renewable acceleration and grid reinforcement as supporting infrastructure. |

## Consultation Draft National Planning Policy Framework (2025)

1.1.24 The National Planning Policy Framework (NPPF) was first published in March 2012, replacing a number of Planning Policy Statements (PPSs) and Planning Practice Guidance Notes (PPGs) with a single, streamlined document. The NPPF introduced the presumption in favour of sustainable development, often referred to as a 'golden thread' running through the document. Since publication in 2012, the NPPF has been revised six times.

1.1.25 On 16 December 2025, the Government published a consultation seeking views on the revised version of the NPPF. The consultation runs until 10 March 2026 and it is anticipated that an amended version will be published in 2026. The current consultation draft represents the most significant rewrite of the NPPF in over a decade, moving toward a clearer, more structured and rules-based framework.

1.1.26 The draft NPPF explicitly seeks to make policies easier to apply and more predictable for developers, local authorities and communities.

1.1.27 The consultation draft NPPF sets out the Government's planning policies for England and how these are expected to be applied. The weight of the NPPF relating to NSIPs is clarified in paragraph 12 of the consultation draft NPPF (and repeated at paragraph 5 in the adopted NPPF), which states:

'*The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications*.'

1.1.28 The draft NPPF, if adopted, could become an important and relevant consideration in decision making for the DCO Application. This will be monitored during the Examination and decision-making process and appropriate updates will be provided to the ExA or Secretary of State prior to adoption if required. The consultation document which accompanies the draft NPPF states that the 12 most significant reforms are, in summary:

- a permanent presumption in favour of suitably located development making clear what forms of development are acceptable in principle in different locations as part of creating a more rules-based approach to development.
- building homes around stations 'in principle' support – a "default yes" – for suitable proposals that develop land around rail stations within existing settlements, and around 'well-connected' train stations outside settlements, including on Green Belt land.
- driving urban and suburban densification to support higher density development in sustainable locations, with good access to services.
- securing a diverse mix of homes
- supporting small and medium sites

- streamlining local standards to promote certainty for applicants and speed up local plan production by limiting quantitative standards in development plans to only those specific issues where local variation is justified. We also want to limit duplication of matters which are covered by the Building Regulations – other than where there is the existing ability to use 'optional technical standards'.
- boosting local and regional economies
- supporting critical and growth minerals to ensure that adequate provision is made for their extraction, recognising their economic importance. In parallel, and in view of the government's mission to achieve clean power by 2030, we want to restrict further the extraction of coal.
- embedding a vision-led approach to transport
- better addressing climate change to set out how decisions can take a proactive approach to both mitigation and adaptation in relation to climate change, in a way that links to other relevant policies in the draft Framework.
- conserving and enhancing the natural environment to make a number of changes, including to reflect Local Nature Recovery Strategies, to recognise landscape character and conserve and enhance existing natural features, to incorporate swift bricks and to provide guidance on sites of local importance for nature.
- taking a more positive approach to the use of heritage assets providing a clearer and more positive approach which can better support suitable heritage related development, replacing the current policies that are difficult to navigate.

1.1.29 The consultation draft NPPF includes a number of new policies which are considered to be of relevance to the Project. In particular, the introduction of Chapter 10: Securing Clean Energy and Water provides recognition of the importance of improving energy and water infrastructure. It brings together existing policies on renewable and low carbon energy with two new policies on planning for energy and water infrastructure, and decision-making on water infrastructure. Of particular note are proposed planning making policies W1: Planning for Water and Energy, W2: Securing Renewable and Local Carbon Energy and Electricity Network Infrastructure and national decision-making policy W3: Renewable and low carbon energy development and electricity network infrastructure.

### W1: Planning for Energy and Water

1.1.30 Whilst this is a plan-making policy (rather than a decision-making policy) it is important for National Grid in that it emphasises the need for development plans to reflect the capacity of, and future requirements for, energy infrastructure. The aim is to make sure that potential constraints caused by current or future deficits in capacity are identified and addressed proactively at the plan-making stage. The policy also expects plans to make appropriate provision for new and upgraded infrastructure, and to include measures to avoid constraining the operation or expansion of water and electricity networks.

### W2: Securing Renewable and Low Carbon Energy and Electricity Network Infrastructure

1.1.31 This policy updates paragraph 165 of the current Framework which sets out the need for local planning policy to help increase the use and supply of renewable and local

carbon energy and heat. In addition to renewable and low-carbon energy development, the policy now refers to electricity network infrastructure.

1.1.32 The policy requires development plans to identify areas suitable for renewable and low carbon energy development and electricity network infrastructure, including future re-powering and life extensions.

1.1.33 A definition of electricity network infrastructure is proposed for inclusion in the glossary to ensure consistent interpretation.

1.1.34 In recent consultation responses to the Basildon Local Plan Regulation 18 (Part 3) and Colchester Local Plan Regulation 18 consultations, National Grid has sought to highlight draft plan-making policies W1 (Planning for Energy and Water) and W2 (Securing renewable and low carbon energy, and electricity network infrastructure) in adding support to the role and function of National Grid insofar as the administering of its responsibilities is concerned, including expansion of the existing electricity network where required.

### W3: Renewable and Low Carbon Energy Development and Electricity Network Infrastructure

1.1.35 This decision-making policy consolidates current Framework paragraphs 168 and 169 and introduces references to electricity network infrastructure. The re-cast policy goes beyond the existing by indicating that substantial weight should be given to benefits for energy security, economic development and net zero, the additional benefits from re-powering, and the contribution that small-scale and community-led developments can make. Additionally, the policy clarifies the need for decommissioning and site restoration for time-limited developments, recognising that most renewable and low-carbon energy schemes are permitted on a temporary basis. Current Framework paragraph 169 is proposed to be modified, so that where these types of development come forward outside areas identified in the development plan, they should be assessed against the national decision-making policies as a whole, rather than the criteria used for identifying suitable areas in the development plan. This is to reduce any uncertainty about how this policy should be applied in practice, and to reflect the more comprehensive role that national decision-making policies are intended to play in assessing development.

1.1.36 The policy sets out that:

- substantial weight should be given to proposals for renewable/low carbon energy and electricity network infrastructure, strengthening the planning balance in favour of such infrastructure.
- applicants are not required to demonstrate the need for renewable and low-carbon energy development and **electricity networks infrastructure** proposals. As drafted, paragraph (2) of Policy W3 states *Applicants should not be required to demonstrate the need for renewable or low carbon energy development and electricity network infrastructure. Where proposals for this form of development come forward outside areas which have been identified as suitable for them they should be acceptable when assessed against the national decision-making policies in this Framework, taken as a whole.*
- electricity networks provide wider economic and energy-security benefits (beyond carbon reduction) as substantial weight factors.

1.1.37 Collectively, plan making policies W1 and W2 alongside national decision-making policy W3 create a coherent and positive framework for electricity networks framing them as:

- Essential enablers of national objectives for net zero, energy security and economic growth (W1)
- Infrastructure to be planned for spatially and strategically (W2)
- Development that should be positively weighed in decision-making (W3)

1.1.38 This policy context helps to align with the positions set out in the 2024 and 2026 NPS EN-1 and EN-5.

1.1.39 An assessment of the Project's compliance with the consultation draft NPPF is set out in Table 1.11.

## National Development Management Policies

1.1.40 The reforms to the English planning system introduced through the Levelling-up and Regeneration Act 2023 (LURAct) represent a significant evolution in the role and hierarchy of planning policies in England. A key innovation in this legislative package is the concept of National Development Management Policies (NDMPs), designed to provide a nationally consistent set of development management policy standards across the country.

### Origins of NDMP

1.1.41 NDMPs were first established in statute under the LURAct. The Act empowers the Secretary of State to designate policies relating to the development or use of land in England as national development management policies and requires that, in preparing or modifying such policies, the Secretary of State must undertake public consultation and have regard to climate change considerations. Importantly, the Act amends the decision-making framework under section 38 of the Planning and Compulsory Purchase Act 2004 so that planning decisions must be taken in accordance with both the development plan and NDMPs, and where there is conflict between the two, the NDMPs are to prevail. This statutory hierarchy was intended to standardise decision-making and reduce local variance on issues that are of broad national relevance (e.g., design standards, heritage, flood risk, environmental protections).

### Current Status of Implementation

1.1.42 Although the statutory regime for NDMPs is established in the LURAct, the policies themselves have not yet been formally adopted or brought into force. Secondary legislation and detailed drafting of the NDMPs are required before they can take effect. Notably, the Government has indicated that, in the short term, it does not intend to introduce NDMPs in their statutory form, but will instead embed the core principles they were intended to embody directly into an updated National Planning Policy Framework (NPPF) policy text on a non-statutory basis.

1.1.43 This shift reflects a pragmatic response to the risks and uncertainties associated with immediately implementing a new statutory tier of policy. Ministers have confirmed that NDMP-style policies will initially be included as part of the revised NPPF's decision-making policies, which authorities and applicants will be expected to apply

in planning decisions. While these NDMP-derived policies will not carry the same statutory footing envisaged in the LURAct, they are intended to achieve greater consistency, clarity, and predictability in decision-taking, and to reduce unnecessary repetition of general development management policies in local plans.

### Relationship with the NPPF Consultation

1.1.44 The current consultation on the proposed revised NPPF (running until 10 March 2026) is deliberately structured to establish a new, more rules-based national policy framework comprising separate plan-making and decision-making policy components. These decision-making policies are effectively the immediate vehicle through which NDMP principles will be realised. The consultation document makes clear that while the Government is not commencing the statutory powers for NDMPs at this stage, it intends the draft decision-making policies to fulfil the same core objectives: to embed clear, nationally applicable standards that reduce unnecessary deviation in local plans and support faster, more consistent decisions on development proposals.

1.1.45 Respondents to the consultation are invited to consider whether the separation of plan-making and decision-making policies, and the incorporation of NDMP-style provisions into the NPPF, will achieve these aims. The consultation also offers a practical opportunity for stakeholders to shape the content of the policies that will form the basis of decision-taking in England for the foreseeable future.

1.1.46 In summary, NDMPs represent a legislative intention to standardise national development management policy, and although their statutory form remains pending, the current NPPF consultation is the Government's chosen route to embed their principles immediately in national planning policy.

## Transitional Regional Energy Strategic Plan (tRESP)

1.1.47 The Transitional Regional Energy Strategic Plan (tRESP) was published on 30 January 2026. The tRESP was prepared by the National Energy System Operator (NESO) and provides a strategic planning framework that supports the delivery of national energy policy objectives set out in National Policy Statement EN-1 and the Government's Clean Power 2030 ambition. It establishes a nationally consistent approach to identifying strategic energy needs at a regional level, ensuring that electricity network development is planned in a coordinated and anticipatory manner commensurate with the scale and urgency of decarbonisation.

1.1.48 EN-1 identifies an urgent and overriding need for new and reinforced electricity transmission infrastructure to facilitate the connection and efficient distribution of substantial volumes of low-carbon electricity, particularly in regions experiencing rapid growth in renewable generation. Clean Power 2030 reinforces this position by setting an accelerated pathway towards a predominantly clean electricity system, requiring timely and proactive network investment to avoid constraints that could delay or frustrate the delivery of nationally important energy infrastructure.

1.1.49 Within this policy context, the tRESP provides:

- A strategic, system-wide evidence base for future electricity demand and generation growth
- Consistent planning assumptions and pathways aligned with net zero and Clean Power 2030 trajectories

- Identification of strategic energy needs at regional and sub-regional scales, including areas where existing network capacity is likely to be insufficient to accommodate future electricity flows.

1.1.50 While the tRESP does not identify or endorse individual transmission projects by name, it identifies the underlying strategic need for enhanced electricity network capacity in regions including East Anglia and the South East, where significant volumes of low-carbon generation are expected to connect and where power must be transported efficiently to centres of demand. The Norwich to Tilbury Project is promoted to address precisely these strategic challenges, providing additional transmission capacity to relieve constraints and enable the onward distribution of electricity generated in East Anglia.

1.1.51 Accordingly, the Norwich to Tilbury Project is consistent with, and supported by, the strategic objectives and evidence base established by the tRESP, which seeks to ensure that electricity network development is planned proactively, efficiently and in alignment with national policy. The tRESP therefore provides relevant strategic context demonstrating that the Project responds to clearly identified regional and national energy system needs, as required by EN-1, and supports the timely delivery of Clean Power 2030.

## Dedham Vale National Landscape and Stour Valley Project Area Management Plan 2026-31

1.1.52 The Dedham Vale National Landscape was formerly designated as an Area of Outstanding Natural Beauty (AONB), and the legal designation continues unchanged despite the name update. The Management Plan is prepared under statutory requirements of the Countryside and Rights of Way Act 2000 for designated landscapes.

1.1.53 The 2026–2031 Management Plan replaces the previous 2021–26 edition and sets out a framework to guide decision-making and activity within the National Landscape and Stour Valley project area over the next five years.

1.1.54 The Plan provides a vision for conserving and enhancing the area's natural beauty, landscape quality, biodiversity, cultural heritage, and community wellbeing.

1.1.55 It includes:

- A delivery plan with actions and priorities
- Alignment with the Protected Landscapes Targets and Outcomes Framework developed by the Department for Environment, Food and Rural Affairs (Defra)
- A Climate Change Adaptation Plan to support landscape resilience.

1.1.56 It does not itself create land-use planning policy. Rather, it provides evidence and guidance to inform policy and development decisions and is described as a material consideration in planning matters.

1.1.57 Although the full 2026–2031 text is newly published, the Management Plan retains the structure and intent of the previous edition, with strategic themes that shape how the area should be managed:

1) a. Conservation and Enhancement of National Landscape Qualities

i. Support actions that uphold the purposes of designation — conserving natural beauty, historic landscapes, tranquillity, scenic quality and distinctive character

ii. Resist proposals that would have significant negative impacts on those qualities.

2) b. Villages, Infrastructure and Residents

i. Ensure that development and infrastructure — including utilities and transport proposals — considers landscape character and does not undermine the National Landscape's qualities.

ii. Promote high-quality village development that supports landscape and community aims.

3) c. Enjoying the Area / Visitor Experience

i. Encourage responsible access and tourism that supports local economies without detracting from landscape values

ii. Promote sustainable travel options and visitor behaviour that minimises environmental impacts.

4) d. Climate Change & Nature Recovery

i. Integrate nature recovery and climate adaptation actions, including tree cover where appropriate, water-related habitat enhancement and nature-based solutions.

5) e. River and Tributary Management

i. Promote conservation of the River Stour system and tributaries as key ecological and landscape assets, including sensitive recreation.

6) f. Partnership and Delivery

ii. Strengthen collaboration among local authorities, landowners, communities and conservation partners to deliver shared objectives.

1.1.58 Although the Management Plan itself does not create statutory planning policy, its preparation under the Countryside and Rights of Way Act 2000 means:

- It represents a statutory framework for how the landscape should be managed
- It is intended to be used alongside national and local planning policy in decision-making processes and can carry weight as a material consideration in planning applications and consultations.

1.1.59 The National Planning Policy Framework (NPPF) recognises now National Landscapes as nationally important landscapes where the conservation and enhancement of natural beauty is a statutory purpose. Proposals affecting these areas must take that purpose into account. Paragraphs in the NPPF specific to protected landscapes (e.g., NPPF paras 182-183 in current guidance) require that planning decisions conserve and enhance natural beauty, scenic quality, wildlife and cultural heritage.

1.1.60 Councils whose administrative areas include the National Landscape incorporate policies in their Local Plans that reflect both national planning policy and the Management Plan's objectives. Such policies often:

- Require development proposals to demonstrate how they contribute to conserving the special qualities of the landscape
- Apply strong protections against major development that would undermine landscape integrity unless exceptional circumstances are justified
- Reference the Management Plan's objectives and evidence in policy criteria.

1.1.61 The Management Plan is used by statutory bodies, planning authorities, developers and consultees when assessing proposals, particularly where the landscape and its setting could be affected. Its status as a thoroughly consulted and evidence-backed document strengthens its weight in plan-making and development control.

1.1.62 The assessment of effects on the special qualities of Dedham Vale National Landscape, set out in **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]**, was reviewed against the 2026-31 Management Plan. There is no change to the identified special qualities of Dedham Vale National Landscape, which are set out in the Alison Farmer Associates report: Dedham Vale AONB Natural Beauty and Special Qualities and Perceived and Anticipated Risks (July 2016). The findings of the National Landscape Assessment Study therefore remain valid.

1.1.63 The 2021-26 Management Plan set out Management Plan Policies. These have been expanded upon as a series of Management Plan Principles under the headings of Place, People, Nature and Climate in the 2026-31 Management Plan. Place Principle 07 states that: "*Major development should avoid the Dedham Vale National Landscape in line with national policy. Where it is decided that such development will take place in or in the setting of the Dedham Vale National Landscape an assessment of the impacts on the defined natural beauty features should be undertaken. Such proposals should seek to minimise and mitigate negative impacts. Residual impacts should be compensated for with measures to deliver the aims of the Dedham Vale National Landscape and Stour Valley management plan 2026-31*." Although an assessment of effects on Natural Beauty indicators was not carried out by the Applicant, it is considered that the assessment of effects on special qualities is reflective of Natural Beauty indicators (Landscape Quality, Scenic Quality, Relative Wildness, Relative Tranquillity, Natural Heritage Features and Cultural Heritage).

1.1.64 The 2026-31 Management Plan notes that "*all relevant authorities operating within the Dedham Vale National Landscape or its setting, 'must seek to further the statutory purpose of its designation*" in line with section 85 of the Countryside and Rights of Way Act (2000). **5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]** sets out steps which would seek to further the statutory purposes of the National Landscape. A list of potential projects is provided in Annex A; these were provided by the National Landscape Team and were based on the Management Plan Principles which are set out in the 2026-31 Management Plan.

1.1.65 The 2026-31 Management Plan provides a definition of 'setting' which was not included within the 2021-26 Management Plan. Setting is defined as "*the area immediately surrounding a National Landscape that may not be included in the designated AONB, but still has a visual, sensory, or landscape connection to it. The setting can significantly influence the character, views (to and from), and experience of the National Landscape itself.*" The definition of setting in the Applicant's assessment is set out in paragraph A.5.31 in Annex A of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]** as

"*the land surrounding the designated area which, whilst not designated, has a complementary relationship and is intervisible with the designated landscape. The setting contributes to the understanding of the significance of the landscape*." As these definitions are broadly similar, there is no change to the conclusions with regard to the setting of the National Landscape.

## 1.2 Signposting for Compliance with NPS EN-1 (January 2026)

Table 1.8 Signposting for Compliance with EN-1

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| **Chapter 1: Introduction** | | |
| **1.1 Background** | | |
| 1.1.2 | It has effect for the decisions by the Secretary of State on applications for energy developments that are nationally significant under the Planning Act 2008. For such applications this NPS, combined with any technology specific energy NPS where relevant, provides the primary policy for decisions by the Secretary of State. | This accordance table and Chapter 8 of the **Planning Statement [APP-085]** concludes compliance with NPS EN-1 and other relevant NPSs and demonstrate that the Project will not result in adverse impacts that outweigh its benefits. The extent and nature of the residual impacts do not trigger the exceptions set out in national planning policy to refuse consent with the presumption firmly engaged in favour of granting development consent<br>Section 8.3 of the **Planning Statement [APP-085]** establishes that the first three sub clauses in paragraph 1.1.4 are not triggered. Specifically:<br>• there is no evidence to suggest that the granting of the DCO for the Project would lead to the UK being in breach of any of its international obligations;<br>• there is no evidence to suggest that the granting of the DCO for the Project would lead the SoS to be in breach of any such duty; and<br>• there is no evidence to suggest that the granting of the DCO for the Project would be unlawful by virtue of any enactment.<br>In addition to this, there is no evidence to suggest that the granting of the DCO would be contrary to any regulations about how the Secretary of States decisions are to be taken. |
| 1.1.4 | The Planning Act 2008 also requires that, where an NPS has effect, the Secretary of State must decide an application for energy infrastructure in accordance with the relevant NPSs except to the extent the Secretary of State is satisfied that to do so would:<br>• lead to the UK being in breach of its international obligations<br>• be in breach of any statutory duty that applies to the Secretary of State<br>• be unlawful<br>• result in adverse impacts from the development outweighing the benefits<br>• be contrary to regulations about how its decisions are to be taken | |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| **Chapter 2: Government policy on energy and energy infrastructure development** | | |
| **2.2 Clean Power 2030 and net zero by 2050** | | |
| 2.2.6 | In December 2024 the government published the Clean Power 2030 Action Plan. The plan sets out infrastructure deployment pathways and generation capacity ranges that will ensure by 2030 clean sources produce at least 95% of Great Britain's generation, meeting the sixth Carbon Budget advice and pushing the country towards net zero 2050. | The NESO's Clean Power 2030 report (Annex 2) identifies the Project as critical to delivering a network which supports the clean power pathways, but at present has a delivery date after 2030. Support is therefore needed to bring the Project forward for 2030 delivery. NESO's Clean Power 2030 report also states that the Project (AENC and ATNC – the Network Options Assessment code for Norwich to Tilbury) and Sea Link are critical for connecting offshore wind in the North Sea and supporting the flow of clean power. Constraint costs arise when NESO has to manage this problem by paying generators to reduce (turn-down) their electricity output in areas that are congested and switch on (turn-up) in locations closer to electricity users. The specific reference to the Project in the Clean Power 2030 report provides additional recognition of the need for the Project to what is stated on the need for new electricity networks. |
| **2.3 Meeting Clean Power 2030 and net zero ~~Net Zero~~** | | |
| 2.3.3 | Our objectives for meeting the Clean Power 2030 Mission ~~the energy system~~ are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050, including through delivery of our carbon budgets and Nationally Determined Contribution. ~~This will require a step change in the decarbonisation of our energy system.~~ | The Project will deliver on the UK's Clean Power 2030 mission to achieve energy security, boost the economy, and tackle climate change by ensuring clean sources produce enough electricity to meet demand by 2030.<br>The **Strategic Options Backcheck and Review (SOBR) [APP-355]** and the **Planning Statement [APP-085]** explain that the Project is one of the essential network reinforcements needed to deliver the UK's net zero target. The reinforcement will also support security and reliability of supply, in accordance with Paragraph 2.3.3. Without reinforcement, the capacity of the existing network in East |
| 2.3.4 | Meeting ~~these~~the Clean Power 2030 Mission objectives necessitates a significant ~~amount of~~ investment in new energy infrastructure, both large ~~national~~nationally significant developments and ~~small~~smaller-scale | |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | developments determined at a local ~~scale. This includes the infrastructure needed to convert primary sources of energy (e.g. wind) into energy carriers (e.g. electricity or hydrogen), and to store and transport primary fuels and energy carriers into and around the country. It also includes the infrastructure needed to capture, transport and store carbon dioxide. The~~level. This requirement for new energy infrastructure will present opportunities for the UK and contributes towards ~~our ambition to support~~the creation of secure, well paid jobs in the UK's clean energy industry and ~~local~~building domestic supply chains. | Anglia is insufficient to accommodate the connection of proposed new power sources connecting in the area. The Project would provide this reinforcement, helping to deliver 50 GW of offshore wind by 2030, and ultimately contributing towards achieving net zero. |
| 2.3.5 | ~~The sources of energy we use are changing. Since the industrial revolution, our energy system has been dominated by fossil fuels. That remains the case today. Although representing a record low, fossil fuels still accounted for just over 76 per cent of energy supply in 2020. We need to dramatically increase the volume of energy supplied from low carbon sources.~~As set out in the Clean Power Action Plan, this will be driven through rapid deployment of low carbon generation, flexibility infrastructure, and electricity transmission infrastructure. The Action Plan sets out targets for the 2030 capacities of key technologies at a national and regional level. | |
| 2.3.6 | ~~We need to transform the energy system, tackling emissions while continuing to ensure secure and reliable supply, and affordable bills for households and businesses. This includes increasing our supply of clean energy from renewables, nuclear and hydrogen manufactured using low carbon processes (low carbon hydrogen), and, where we still emit carbon, developing the industry and infrastructure to capture, transport and store it.~~Securing affordable, homegrown and abundant renewable resources means we will be able to run our power system for increasing periods | |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | on clean, low carbon generation, with renewables providing the vast majority of generation, and nuclear continuing to deliver a backbone of vital low carbon power. A clean power system will enable further electrification of demand sectors and therefore increased emissions reduction. | |
| 2.3.7 | ~~Decarbonisation means we are likely to become more dependent on some forms of energy compared to others. Using electrification to reduce~~Reducing emissions in large parts of transport, heating and industry could lead to more than half of ~~final~~total energy demand being met by clean electricity in 2050, up from 17 per cent in 2019, representing a doubling in demand for electricity. | This paragraph emphasises that, in addition to the need to decarbonise existing electricity supplies, a substantial increase (double by 2050) in the total electricity generated to enable decarbonisation across all sectors is needed. The Project is designed to support this increasing demand for electricity, as set out in the **Strategic Options Backcheck and Review (SOBR) [APP-355]** and the **Planning Statement [APP-085]** |
| **2.5~~6~~ Sustainable Development** | | |
| 2.5.6 | Whatever incentives, rules or other signals developers are responding to, the government believes that the NPSs set out planning policies which both respect the principles of sustainable development and can facilitate, for the foreseeable future, the consenting of energy infrastructure on the scale and of the kinds necessary to help us maintain safe, secure, affordable and low carbon supplies of energy. | The reinforcement provided by the Project will ensure we have sufficient infrastructure to support the transition to net zero and therefore the Project will support the climate change objectives of maintaining safe, secure, affordable and low carbon supplies of energy in accordance with Paragraph 2.5.6.~~5.~~ |
| **Chapter 3: The need for new nationally significant energy infrastructure projects** | | |
| **3.1 Introduction** | | |
| 3.1.1 | This Part of the NPS explains why the government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the government considers that the need for such infrastructure is urgent. | National Grid notes that, in accordance with Paragraph 3.1.1, the need for infrastructure such as the Project is established, it is urgent, and substantial weight should be given to this need when considering the application for development consent. |
| 3.1.2 | However, it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts. These effects will be minimised | It is recognised that there may be some significant residual impacts associated with large-scale energy infrastructure. The Application is accompanied by an **Environmental** |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | by the application of policy set out in Parts 4 and 5 of this NPS. See also Part 2 of each technology specific NPS. | **Statement (ES) (APP-123 to APP-298)** which provides the final assessment of the likely significant effects associated with the Project during its construction and operation. Chapter 8 of the **Planning Statement [APP-085]** explains that in terms of the overall planning balance, the clear and substantial benefits of the Project clearly outweigh any adverse impacts. The presumption in favour of consent in NPS EN 1sets out that these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure and that any tests set out in the NPS or other planning policy are to be treated as if they have been met. |
| **3.2 Secretary of State decision making** | | |
| 3.2.4 | It is not the role of the planning system to deliver specific amounts or limit any form of infrastructure covered by this NPS. It is for industry to propose new energy infrastructure projects that they assess to be viable within the strategic framework set by government. This is the nature of a market-based energy system. | The NESO's Clean Power 2030 report identifies the Project as critical to delivering a network which supports the clean power pathways, but at present has a delivery date after 2030. Support is therefore needed to bring the Project forward for 2030 delivery. NESO's Clean Power 2030 report also states that the Project (AENC and ATNC – the Network Options Assessment code for Norwich to Tilbury) and Sea Link are critical for connecting offshore wind in the North Sea and supporting the flow of clean power. Constraint costs arise when NESO has to manage this problem by paying generators to reduce (turn-down) their electricity output in areas that are congested and switch on (turn-up) in locations closer to electricity users. The specific reference to the Project in the Clean Power 2030 report provides additional recognition of the need for the Project. |
| 3.2.~~6~~8 | The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of | In accordance with section 104 of the Planning Act 2008, the application will be determined in accordance with the |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | infrastructure which is urgent, as described for each of them in this Part. | NPS as primary policy for decision making and the NPS recognises that the need for the Project is demonstrated. |
| 3.2.~~7~~9 | In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008. | |
| 3.2.~~7~~9 | The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS. | |
| **3.3 The need for new nationally significant electricity infrastructure** | | |
| 3.3.3 | To ensure that there is sufficient electricity to meet demand, new electricity infrastructure will have to be built to replace output from retiring plants and to ensure we can meet increased demand. Our analysis suggests that even with major improvements in overall energy efficiency, and increased flexibility in the energy system, demand for electricity is likely to increase significantly over the coming years and could more than double by 2050 as large parts of transport, heating and industry decarbonise by switching from fossil fuels to low carbon electricity. The Impact Assessment for CB6 shows an illustrative range of 465-515TWh in 2035 and 610-800TWh in 2050. | Consistent with the Government's Net Zero target, there has been, and continues to be, growth in the volume of renewable and zero carbon generation that is seeking to connect to the electricity transmission system in the East Anglia and South East regions. UK Government policy clearly sets out the critical requirement for significant reinforcement of the transmission system to facilitate the connection of renewable energy sources and to transport electricity to where it is used. In particular, the British Energy Security Strategy (HM Government, 2022) sets targets for the connection of up to 50 GW of offshore wind by the 2030s as a key part of a strategy for secure, clean and affordable British energy for the long term.<br>East Anglia's 400 kV electricity transmission network was built in the 1960s. It was built to supply regional demand, centred on Norwich and Ipswich. For many years, the only significant power stations generating in the East Anglia region were the Sizewell A and the Sizewell B nuclear power stations, Spalding North and Sutton Bridge gas fired power stations, and some further smaller 132 kV connected gas fired power stations. |
| 3.3.4 | There are several different types of electricity infrastructure that are needed to deliver our energy objectives. Additional generating plants, electricity storage, interconnectors and electricity networks all have a role, but none of them will enable us to meet these objectives in isolation. | |
| 3.3.16 | If demand for electricity doubles by 2050, we will need a fourfold increase in low carbon generation and significant expansion of the networks that transport power to where it is needed. In addition, we committed in the Clean Power | |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | 2030 Action Plan to clean sources producing at least 95% Great Britain's generation. This will set us well on the way to the commitment in the Net Zero Strategy to take action ~~so that by 2035, all our electricity will come from low carbon sources, subject to security of supply~~, whilst meeting a 40-60 per cent increase in electricity demand. This means that the majority of new generating capacity needs to be low carbon. | This generation capacity has recently been added to by several offshore windfarms with the existing generation totalling 6,552.4 MW of installed capacity. This is expected to grow substantially in coming years. In the East Anglia region, connection agreements have been signed for 26,919.9 MW of new generation (total generation of 33,472.3 MW minus existing generation of 6,552.4 MW). These future connection agreements comprise a large volume of offshore wind generation (including East Anglia Offshore Wind), gas-fired generation, energy storage projects, and a nuclear power station (at Sizewell C).<br>The NESO's Clean Power 2030 report (NESO, 2024) identifies the Project as critical to delivering a network which supports the clean power pathways, but at present has a delivery date after 2030. Support is therefore needed to bring the Project forward for 2030 delivery.<br>The Project will make a significant contribution to this need and will reinforce the transmission system in East Anglia in order to meet current and future demand. Without reinforcement, the capacity of the existing network in East Anglia is insufficient to accommodate the connection of proposed new power sources connecting in the area. This reinforcement will ensure that, in accordance with national policies and targets, the Project will improve the existing electricity transmission network, and will contribute to energy independence, the UK's decarbonisation requirements and climate change targets, and assist in ensuring the supply of energy remains secure, reliable and affordable.<br>The Project notes the insertion of the additional reference to 'in all but the most exceptional circumstances' and considers this adds additional clarity to the meaning and effect of CNP status in the NPS framework. |
| 3.3.~~35~~34 | In considering applications, applicants are expected to consider foreseeable future demand when considering the location and route of their investments. This may involve consenting offshore platforms, converter stations or substations which facilitate future coordination | |
| 3.3.63 | Subject to any legal requirements, the urgent need for CNP ~~Infrastructure~~infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, ~~will in general~~means that it is likely the need case will outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy~~.~~, in all but the most exceptional<br>circumstances. Government strongly supports the delivery of CNP ~~Infrastructure~~infrastructure and it should be progressed as quickly as possible. | |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| **The need for new electricity networks** | | |
| 3.3.65 | There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives. | It is evident that the Project is seeking to respond to the urgent need for new electricity network infrastructure and the programme for the Project's delivery seeks to achieve this at pace, whilst ensuring all required obligations are met. |
| 3.3.66 | The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security. The delivery of this important infrastructure also needs to balance cost to consumers, accelerated timelines for delivery and the minimisation of community and environmental impacts. | The **Strategic Options Backcheck and Review (SOBR) [APP-355]** and the **Planning Statement (APP-085]** clearly set out the need for the Project. |
| 3.3.67 | The need to connect to new sources of electricity generation and new sources of demand is not the only driver for new electricity network infrastructure. As the electricity system grows in scale, dispersion, variety, and complexity, work will be needed to protect against the risk of large-scale supply interruptions in the absence of sufficiently robust electricity networks. While existing transmission and distribution networks must adapt and evolve to cope with this reality, development of new lines of 132kV (and over 2km) and above will also be necessary to preserve and guarantee the robust and reliable operation of the whole electricity system. | National Grid lies at the heart of a transforming energy system. National Grid plays a vital role in connecting millions of people to the energy they use, while continually seeking ways to make the energy system cleaner. National Grid owns and manages the national high-voltage electricity transmission system throughout England and Wales. National Grid owns, builds and maintains the infrastructure; overhead lines, buried cables and substations as a few examples, to allow power to move around the country. The key role of this transmission system is to connect the electricity generators' power stations with regional Distribution Network Operators (DNOs) who then supply businesses and homes. In return for the connection, users of the transmission network pay a tariff to National Grid. The Project forms a part of the Great |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | Grid Upgrade, which is the largest overhaul of the electricity grid in generations. |
| 3.3.68 | The volume of onshore reinforcement works needed to meet decarbonisation targets is substantial. ~~National Grid ESO~~NESO forecasts that over the next decade the onshore and offshore transmission network, some of which is located offshore will require a doubling of north-south power transfer capacity due to increased wind generation in Scotland; substantial reinforcement in the Midlands to accommodate increased power flows from Scotland and the North of England; substantial reinforcement in London and the South of England to allow for Europe- bound export of excess wind generation from Scotland and the North of England, as well as the importation of energy from Europe to increase resilience during any periods which may be affected by intermittent energy generation mix and as part of the country's transition to increased energy security; and substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation (this may also require additional offshore connections coming to land in England~~).~~) | National Grid notes that the Project intends to, in part, support the '*substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation (this may also require additional offshore connections coming to land in England)*', as per Paragraph 3.3.68. |
| 3.3.69 | It is important to note that the crucial national benefits of increased system robustness through new electricity network infrastructure projects are shared by all users of the system. | National Grid shares in this ambition, and through its operations is central to achieving it. |
| 3.3.70 | As all new grid projects have a role in efficiently constructing, operating and connecting low carbon infrastructure to the National Electricity Grid, the scope of networks CNP infrastructure is not limited to those associated specifically with a particular project. | Noted, the Project is Critical National Priority, as established in paragraph 4.2.5 of NPS EN-1, and it supports a number of generation projects, such as the Five Estuaries and North Falls offshore wind farms (not one discrete project), being primarily a network reinforcement. |
| 3.3.71 | The historical approach to connecting offshore wind resulted in individual radial connections developed project- | The Project facilitates a more coordinated approach to transmission as it seeks to connect generation and |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | by-project. This may continue to be the most appropriate approach for some areas with single offshore wind projects that are not located in the vicinity of other offshore wind and / or offshore infrastructure that is planned or foreseen in the near future. For regions with multiple windfarms or offshore transmission projects it is expected that a more coordinated approach will be delivered. For these areas, this approach ~~is likely~~has the potential to reduce the network infrastructure costs as well as the cumulative environmental impacts and impacts on coastal communities by installing a smaller number of larger connections, each taking power from multiple windfarms instead of individual point- to-point connections for each windfarm. | transmission projects in the North Sea and throughout East Anglia to the wider grid. For example, at the new EACN Substation, agreements are in place with two offshore wind farm projects and an interconnector for based on their connections into the new substation. See also the response to 3.3.70 |
| 3.3.72 | Connecting the volume of offshore wind capacity targeted by the government will require not only new offshore transmission infrastructure but also reinforcement to the onshore transmission network, to accommodate the increased power flows to regional demand centres. | See response to 3.3.70. |
| 3.3.73 | Due to the time required to plan, approve and construct the required new onshore transmission infrastructure, to date the completion of these onshore reinforcements has often taken longer than the completion of the offshore wind farms for which they are being built. This could present a material barrier to the delivery of UK ~~Government~~government ambition to ~~deliver up to 50GW~~accelerating the deployment of offshore wind ~~by~~to meet our Clean Power 2030 Mission. | NESO's (2024b) Clean Power 2030 Report establishes that the Project is critical to achieving the Governments objective to have a clean power system by 2030.<br>At present the Project has a delivery date after 2030 and, therefore, support is needed to bring the Project forward for 2030 delivery.<br>See also the analysis against EN-1 paragraph 3.3.74 below. |
| 3.3.74 | The strategic approach to network planning, including the Holistic Network Design (HND) for onshore-offshore transmission, ~~planned HND~~ follow-~~on~~up exercises and the ~~proposed move to~~ Centralised Strategic Network ~~Planning~~ | The Project was part of the Offshore Transmission Network Review (OTNR) and Offshore Coordination Support Scheme (OCSS) studies. is not being submitted as part of larger, single application which incorporates the renewable |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | ~~for the onshore-offshore network~~Plans, allows for clearer identification of needs and includes upfront consideration of environmental and community impacts. Government recognises the work undertaken in these strategic network planning exercises and these should be an important and relevant consideration in the consenting process. This recognition of the network designs seeks to directly support progress of projects identified within the designs as they are brought forward for consent. Further details are provided in Section 2.8 and 2.13 of EN-5. | energy projects which will connect into the electricity transmission network.<br>These studies explored various opportunities to seek to improve the economic competitiveness and efficiencies that may be available through collaboration between projects. The OTNR has been progressed since its announcement in 2020. The review brought together key stakeholders involved in the timing, siting, design and delivery of offshore wind, to consider all aspects of the existing regime and how this influences the design and delivery of transmission infrastructure. The Five Estuaries and North Falls offshore wind farm projects engaged in the OTNR.<br>In April 2022 the Government announced the OCSS which came as a result of the OTNR. The OCSS provided grant funding for projects to explore potential coordination options for offshore transmission infrastructure. The fund was available to those projects that were further developed than those eligible for the Holistic Network Design (HND). The HND provided a recommended offshore and onshore design for a 2030 electricity network which facilitated the government's ambition of 50GW of offshore wind by 2030. At that stage five projects, including the North Falls and Five Estuaries offshore wind farms, Sea Link, EuroLink (now LionLink) and Nautilus committed to exploring coordinated network designs. Applications to the OCSS closed in February 2023 and a consortium of North Falls, Five Estuaries and Sea Link was successful in receiving grant funding. The consortium worked together to explore the potential options for coordination but notwithstanding the funding, ultimately the OCSS was not taken forward, following a government decision in September 2024.<br>In April 2024, National Grid Electricity Transmission provided a response to the electricity system operators |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | (ESO) East Anglian network study, which was part of the OTNR's initiative to explore coordinated offshore infrastructure. This response indicates NGETs engagement with the OTNRs findings and its consideration of these insights in planning and developing transmission projects. By integrating the OTNRs recommendations and collaborating with relevant stakeholders, National Grid aims to ensure that its projects contribute effectively to a coordinated and efficient electricity transmission network, facilitating the UK's transition to net zero emissions. |
| 3.3.75 | ~~The final Phase 1 report for National Grid ESO's Offshore Coordination Project (published December 2020) found that a more integrated approach to offshore transmission, which included efficient planning of the onshore network, could deliver consumer benefits of up to £6 billion by 2050, depending on how quickly it could be implemented. It also found that the number of new electricity infrastructure assets, including cables and onshore landing points could be reduced by up to 50 per cent over the same period, significantly reducing environmental impacts and impacts on coastal communities.~~Given the crucial role of electricity in national decarbonisation and energy security, it is imperative to prioritise holistically planned energy infrastructure. The time required to advance strategically identified transmission projects from network design to delivery further underscores this necessity. The Centralised Strategic Network Plan (CSNP), including future iterations, will use the chosen SSEP pathway to enable the delivery of a long term, holistically designed network plan. The CSNP will be subject to a Strategic Environmental Assessment, however, the detailed designs of individual projects will be subject to public consultation and to relevant environmental assessments at the | Noted, the Project will achieve efficiencies through taking a coordinated approach to transmission as set out in the response to 3.3.70 and 3.3.71.<br>The increased capacity being provided by the Project is critical to delivering a network which supports the clean power pathways as set out in the Clean Power Action Plan 2030.<br>The Project responds to previously established policies and by coming forward as it is, also addresses the urgency and pace required to move towards delivering the necessary improvements to power infrastructure to respond to the challenges of meeting the obligations of the Clean Power Action Plan, and thereafter, net zero, making a significant contribution to both regional and national requirements.<br>The CSNP is a new long-term planning framework being developed by NESO to map demand and optimal transmission infrastructure needs to support net-zero goals. The CSNP has four key principles:<br>• plan strategically ahead of need to enable investments required for net zero<br>• ensure efficiency by taking a holistic view across the onshore and offshore networks |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | consenting stage. This NPS recognises the need for the infrastructure proposed in the forthcoming CSNP, including infrastructure covered by future CSNP publications adopted following a similar process. Therefore, where a project is assessed and justified through a CSNP, the Secretary of State will take the need for that project as having been established and not question the need for that project during the consenting process. | • Robust and transparent assessment of a broad range of options<br>• Accelerate delivery by providing certainty on options to support regulatory and planning processes.<br>The CSNP when published will take a broad, whole energy system view to transform the delivery of affordable, clean and secure power.<br>The CSNP builds on the Pathway to 2030 Holistic Network Design report. This Report and the accompanying ESO East Anglian Network Study (March 2024) consider different electricity network configurations and noting the role of the Project in managing increased power flows into the East Anglia Region. |
| 3.3.~~78~~80 | Further to the ~~needs~~need case above, for projects not brought forward through a CSNP it is recognised that the case for a new connection or network reinforcement is demonstrated if the proposed development represents an efficient and economical means of:<br>• ~~connecting~~Connecting a new generating station or storage facility to the network;<br>• ~~reinforcing~~Reinforcing the network to accommodate such connections~~,~~; or<br>• ~~reinforcing~~Reinforcing the network to ensure that it is sufficiently resilient and capacious (per any performance standards set by Ofgem) to reliably supply present and/or anticipated future levels of demand.<br>In considering the 'economic and efficient' approach the network project needs to follow good design, avoidance and mitigation principles (and / or biodiversity | The Project is Critical National Priority, and it supports a number of generations projects (not one discrete project), being primarily a network reinforcement. As such, the Project is considered to be a means of all of the following:<br>• connecting a new generating station or storage facility to the network<br>• reinforcing the network to accommodate such connections, and<br>• reinforcing the network to ensure that it is sufficiently resilient and capacious<br>Meanwhile, as well as a statutory duty to be economical and efficient, as a licence holder, National Grid has specific duties to uphold in relation to the desirability of preserving amenity of certain aspects of the environment and to mitigate the effects of its activities on the environment under Section 38 and Schedule 9 of the Electricity Act 1989. It is these key responsibilities and objectives which |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | compensation where needed for transmission in the marine environment), as referenced in EN-5. | underpin National Grid's design principles on which the Project is based.<br><br>At multiple stages of the options appraisal process, National Grid has carried out assessments which consider the efficiency and the economic benefits of the Project. This process is set out in the **Strategic Options Backcheck and Review (SOBR) [APP-355]**. This demonstrates that the Project is an efficient and economical means of reinforcing the network.<br><br>The Application is accompanied by an ES **[APP-123 to APP-298]** which provides the final assessment of the likely significant effects, associated with the Project during its construction and operation, after the mitigation hierarchy has been applied. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 3.3.~~79~~81 | Moreover, given the crucial role of networks in connecting all of the other kinds of electricity infrastructure described above, it is especially important that the Secretary of State considers network projects as elements of a coherent and strategically necessary system, whether or not they are linked together in specific NSIPs. For instance, when evaluating applications for new electricity networks infrastructure the Secretary of State should have regard to the fact that given:<br>• ~~i) the~~The government's strategic commitment to ~~ambitious levels of~~more interconnection capacity and offshore wind generation~~,~~; and<br>• ~~ii) the~~The tightly interdependent infrastructure chain linking interconnection and offshore generation with onshore demand centres~~,~~ .<br>delays in the approval of associated new network developments could cause significant economic waste and set back the strategically vital goals of decarbonisation and energy security. | Noted. Whilst the Project does not involve generation, it is intrinsically linked to the success of forthcoming generation projects, particularly in relation to offshore wind, and as set out in response to 3.3.70 and 3.3.71, the Project proposes a coordinated approach to electricity transmission. Therefore, the Project cannot be considered without taking account of the benefits in terms of facilitating grid capacity for new generation projects. |
| 3.3.~~81~~83 | The importance of accelerating coordination does not, however, militate against the need for standalone electricity networks projects, and these projects are supported by this NPS and should continue to be assessed on their own merits. | Noted. There is evident need for the Project in its own right to increase transmission capacity and upgrade the grid in East Anglia. |
| **4** | **Assessment Principles** | |
| **4.1** | **General Policies and Considerations** | |
| 4.1.2 | ~~The~~The Clean Power 2030 Action Plan, Energy White Paper and British Energy Security Strategy ~~emphasises~~all emphasise the importance of the government's net zero commitment and efforts to fight climate change, as well as the need to maintain a secure and reliable energy system. | The Project, if granted development consent, would make an important contribution to reducing greenhouse gases and helping the UK reaching the Government's target of net zero by 2050, by supporting the distribution of greener energy. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | The Levelling Up White Paper calls on the ~~Government~~government to ensure investment in the transition to Net Zero benefits less well-performing parts of the UK, reducing emissions, facilitating economic development and the creation of jobs. | |
| 4.1.3 – 4.1.4 | Given the level and urgency of need for infrastructure of the types covered by the energy NPSs set out in Part 3 of this NPS, the Secretary of State will start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused.<br>The presumption is also subject to the provisions of the Planning Act 2008 referred to paragraph 1.1.4 of this NPS. | Section 104(3) of the Planning Act 2008 sets out that that an application for development consent should be determined in accordance with the relevant NPS except where a limited number of circumstances would apply. It is not considered that any of these limited circumstances would apply, therefore the Application will be assessed against the relevant NPS, any Local Impact Report (As part of the Planning Act 2008 process, the relevant local authorities will be invited to submit a local impact report (LIR) giving details of the likely impact of the Project on the authority's area), and any other matters the SoS thinks are both important and relevant to the decision.<br>The level and urgency of the need for the Project is set out in **ES Chapter 3: Alternatives [APP-127]**, **Planning Statement [APP-085]** and **Strategic Options Backcheck and Review (SOBR) [APP-355]**. Given the Planning Act 2008 requirements set out in Section 104, and the clear statements in respect to a presumption in favour of such types of energy infrastructure as set out in EN-1; the need for the Project has been established. |
| | **Weighing impacts and benefits** | |
| 4.1.5 | In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account:<br>• ~~its~~Its potential benefits including its contribution to meeting the need for the Clean Power 2030 Mission and net zero, energy infrastructure, job creation, | The Application is accompanied by an **Environmental Statement (ES) [APP-123 to APP-298]** which provides the final assessment of the likely significant effects associated with the Project during its construction and operation. The **Planning Statement [APP-085]** concludes that the clear and substantial benefits of the Project clearly outweigh any |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits<br>• ~~its~~Its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy. | adverse impacts. The presumption in favour of consent in NPS EN 1 sets out that these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure and that any tests set out in the NPS or other planning policy are to be treated as if they have been met. |
| 4.1.6 | In this context, the Secretary of State should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels. These may be identified in this NPS, the relevant technology specific NPS, in the application or elsewhere (including in local impact reports, marine plans, and other material considerations as outlined in Section 1.1). | The environmental, social and economic benefits of the Project are set out in Chapter 3 of the Planning Statement. An assessment of the Project against NPS is set out in Chapter 7 of the **Planning Statement [APP-085]**. These take into account of impacts and benefits at national, regional and local levels. The benefits of the Project are weighed against its adverse impacts in the Planning Balance in Chapter 8 of the Planning Statement (see above in relation to EN-1, 4.1.5). |
| 4.1.7 | Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the Secretary of State considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development. For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects not capable of being addressed by application of the mitigation hierarchy, in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, or irreplaceable habitats ~~or unacceptable risk to the achievement of net zero~~. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or | The Norwich to Tilbury Project is a proposal by National Grid to reinforce the high voltage power network in East Anglia. The reinforcement is needed because the existing transmission network, even with current upgrading, will not have sufficient capacity for the new renewable energy (a substantial proportion of which is generated by offshore wind) that is expected to connect to the network over the next ten years and beyond. Completion of the Project, together with other new reinforcements across the country will meet this future energy transmission demand both in East Anglia and across the UK.<br>**The Planning Statement [APP-085]** explains that the Project is Critical National Priority Infrastructure as defined in National Policy Statement EN-1. Without reinforcement, the capacity of the existing network in East Anglia and the Southeast is insufficient to accommodate the connection of |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk. | proposed new power sources connecting in the area. As such, the Project is considered to be a means of all of the following:<br>• Connecting a new generating station or storage facility to the network<br>• Reinforcing the network to accommodate such connections, and<br>• Reinforcing the network to ensure that it is sufficiently resilient and capacious.<br>In line with Paragraph 4.1.7 where a project qualifies as CNP infrastructure the need case for the project will likely outweigh residual effects, unless the residual effects present an unacceptable risk to, or interference with the listed matters. The ES (Volume 6 of the DCO application) and the **Planning Statement [APP-085]** conclude that the Project will not result in residual impacts which present an unacceptable risk to the matters listed in the policy. |
| | **Other documents** | |
| 4.1.10 – 4.1.~~15~~16 | The policy set out in this NPS and the technology specific energy NPSs is intended to provide greater clarity around existing policy and practice of the Secretary of State in considering applications for nationally significant energy infrastructure, (or therefore the "benchmark" for what is, or is not, an acceptable nationally significant energy development).<br>The energy NPSs have taken account of the National Planning Policy Framework (NPPF), the Planning Practice Guidance for England, and Planning Policy Wales and Technical Advice Notes (TANs) for Wales, where appropriate. | National Grid has identified Development Plan policies that may be considered to be important or relevant by the SoS. Policies relevant to the assessments contained in the ES are referred to in **ES Chapter 2: Key Legislation and Planning Policy Context [APP-126]** An assessment of relevant policies is contained within the **Policy Compliance Document [APP-086]** and this Policy Compliance Tracker.<br>The Strategic Spatial Energy Plan (SSEP) is being developed by NESO which will:<br>• Map zones, locations and capacities for future electricity and hydrogen generation, storage and related infrastructure |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | Other matters that the Secretary of State may consider both important and relevant to their decision-making may include Development Plan documents or other documents in the Local Development Framework.<br>Where the project conflicts with a proposal in a draft Development Plan, the Secretary of State should take account of the stage which the Development Plan document in England or Local Development Plan in Wales has reached in deciding what weight to give to the plan for the purposes of determining the planning significance of what is replaced, prevented, or precluded.<br>The closer the Development Plan document in England or Local Development Plan in Wales is to being adopted by the LPA, the greater the weight which can be attached to it.<br>The Secretary of State should also consider spatial plans, such as the Strategic Spatial Energy Plan upon endorsement by all relevant governments.<br>In the event of a conflict between these documents and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure. | • Provide a pathway for energy infrastructure to meet demand and net zero goals<br>• Support and inform network planning and consenting processes.<br>The SSEP will identify future types and locations of infrastructure needs, not to prescribe or list specific individual projects for delivery.<br>The Transitional Regional Energy Strategic Plan (tRESP) was published on 30 January 2026. The tRESP was prepared by the National Energy System Operator (NESO) and provides a strategic planning framework that supports the delivery of national energy policy objectives set out in National Policy Statement EN-1 and the Government's Clean Power 2030 ambition. It establishes a nationally consistent approach to identifying strategic energy needs at a regional level, ensuring that electricity network development is planned in a coordinated and anticipatory manner commensurate with the scale and urgency of decarbonisation.<br>While the tRESP does not identify or endorse individual transmission projects by name, it identifies the underlying strategic need for enhanced electricity network capacity in regions including East Anglia and the South East, where significant volumes of low-carbon generation are expected to connect and where power must be transported efficiently to centres of demand. The Norwich to Tilbury Project is promoted to address precisely these strategic challenges, providing additional transmission capacity to relieve constraints and enable the onward distribution of electricity generated in East Anglia.<br>Accordingly, the Norwich to Tilbury Project is consistent with, and supported by, the strategic objectives and evidence base established by the tRESP, which seeks to |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | ensure that electricity network development is planned proactively, efficiently and in alignment with national policy. The tRESP therefore provides relevant strategic context demonstrating that the Project responds to clearly identified regional and national energy system needs, as required by EN-1, and supports the timely delivery of Clean Power 2030. |
| | **Development consent** | |
| 4.1.~~16~~17 – 4.1.~~17~~18 | The Secretary of State should only impose requirements in relation to a development consent that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects.<br>The Secretary of State should consider the guidance in the NPPF, the Planning Practice Guidance: Use of Planning Conditions, and TANs, or any successor documents, where appropriate. | The application for development consent for the Project is accompanied by a **draft Development Consent Order (Draft DCO) [APP-056]** and an **Explanatory Memorandum [APP-057].** The **Draft DCO**, while may be subject to amendments throughout the examination, sets out the requirements in respect to the construction, operation and maintenance of the Project. The Requirements and their suggested reason for imposition are also explained in the Explanatory Memorandum document.<br>The proposed Requirements have been considered against the tests for planning conditions (necessary; relevant to planning; relevant to the development to be permitted; enforceable; precise; and reasonable in all other respects) as set out in Paragraph 57 of the NPPF. |
| 4.1.~~18~~19 | The Secretary of State may consider any development consent obligations that an applicant agrees with local authorities. These must be relevant to planning, necessary to make the proposed development acceptable in planning terms, directly related to the proposed development, fairly and reasonably related in scale and kind to the proposed development, and reasonable in all other respects. | National Grid's commitment to providing 10% BNG will be secured through a unilateral undertaking given under s.106 of the Town and Country Planning Act 1990. While every effort has been made to deliver the required BNG through replacement planting and on-site mitigation in the form of habitat creation and enhancement, given the scale and nature of the Project, 10 % BNG is not fully achievable on-site. Off-site BNG is therefore proposed to make up any deficit. Biodiversity is not physically bound by planning |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | authority boundaries and therefore a holistic approach is proposed for any off-site BNG, with the aim to deliver a biodiversity legacy ideally in each of the three counties crossed by the Project (Norfolk, Suffolk and Essex).<br>Offsite BNG will be delivered through collaboration with partners and purchased from commercially registered providers. National Grid has been engaging in productive discussions with Norfolk, Suffolk and Essex Wildlife Trusts regarding the provision of off-site BNG units for the Project.<br>National Grid has prepared draft Heads of Terms in relation to s106 Unilateral Undertaking. |
| | **Early engagement** | |
| 4.1.~~19~~20 - 4.1.~~20~~21 | Early engagement both before and at the formal pre-application stage between the applicant and key stakeholders, including public regulators, Statutory Consultees (including Statutory Nature Conservation Bodies (SNCBs)), and those likely to have an interest in a proposed energy infrastructure application, is strongly encouraged in line with the ~~Government's~~government's pre-application guidance. This means that only applications which are fully prepared and comprehensive can be accepted for examination, enabling them to be properly assessed by the Examining Authority and leading to a clear recommendation report to the Secretary of State.<br>This is particularly so in the case of HRA matters covered in paragraphs 5.4.~~25~~26 to 5.4.~~31~~32 below, which explain the onus is on the applicant to submit sufficient information to enable the Secretary of State to conduct an Appropriate Assessment if required. | The Consultation Report **[APP-066]** provides a complete overview of the consultation and stakeholder engagement activities on the Project and explains how National Grid has had regard to the statutory guidance about the pre-application procedure pursuant to Section 50 of the Planning Act 2008.<br>National Grid has undertaken a number of environmental and thematic meetings with relevant stakeholders to gather information about the baseline environment, scope of the assessment and potential effects and mitigation. These have included the following thematic meetings for the following topics:<br>• Landscape and Visual Thematic Meetings: involving the relevant planning authorities, Dedham Vale National Landscape and Natural England.<br>• Biodiversity Thematic Meetings: involving the relevant planning authorities, Natural England, Norfolk, Suffolk and Essex Wildlife Trusts and the RSPB; |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | • Historic Environment Thematic Meetings: involving the relevant planning authorities and Historic England; and<br>• Traffic and Transport Thematic Meetings: involving the relevant planning authorities and National Highways.<br>An overview of this engagement and how this has informed the development of the Project is provided in the **Consultation Report [APP-066]**. |
| | **Financial and technical viability** | |
| 4.1.~~21~~22 – 4.1.~~22~~23 | In deciding to bring forward a proposal for infrastructure development, the applicant will have made a judgement on the financial and technical viability of the proposed development, within the market framework and taking account of government interventions.<br>Where the Secretary of State considers that the financial viability and technical feasibility of the proposal has been properly assessed by the applicant, it is unlikely to be of relevance in Secretary of State decision making (any exceptions to this principle are dealt with where they arise in this or other energy NPSs and the reasons why financial viability or technical feasibility is likely to be of relevance explained). | At multiple stages of the options appraisal process, National Grid has carried out assessments on the financial and technical viability of the Project (see the **Strategic Options Backcheck and Review (SOBR) [APP-355]** for further details). The **Funding Statement [APP-063]** explains how the acquisition of the land necessary to build the Project would be funded as well as how the Project generally is to be funded. |
| **4.2** | **The critical national priority for low carbon infrastructure** | |
| | Rising to the Clean Power 2030 Mission | |
| 4.2.4 | As set out in NESO's advice to the Secretary of State and the Secretary of State's Clean Power Action Plan, the pace of planning delivery needs to significantly increase to allow the government to meet its Clean Energy targets. Many more development consent applications will have to enter the system, and be examined and decided within the statutory timescales. These decisions must be made in accordance with this NPS, relevant technology specific | The Project responds to previously established policies and by coming forward as it is, also addresses the urgency and pace required to move towards delivering the necessary improvements to power infrastructure to respond to the challenges of meeting the obligations of the Clean Power Action Plan, and thereafter, net zero, making a significant contribution to both regional and national requirements. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | NPSs, and all relevant legal requirements, and applications must continue to meet the high standards expected. | |
| | Pre-Application | |
| 4.2.5 | Government is proposing amendments to infrastructure planning, including to the Planning Act 2008 process. Even with these changes, it will require a significant and sustained effort from applicants, planners, LPAs, statutory advisors, Examining Authorities and decision makers to meet this challenge, while listening to host communities. It is a challenge we must meet, and to do that each part of the system needs to work together efficiently to avoid unnecessary delays.<br>Proportionality and focus at all stages of the project preparation, examination and decision making are vital. | National Grid has considered the implications of the Planning and Infrastructure Act 2025.<br>In terms of procedure, the Planning and Infrastructure Act will not have a notable impact on the Project as the majority of the changes are focused on the pre-application and acceptance stages. The changes identified as having potential impacts on the Project all require the production of regulations to enable them to come into force, and this means they may not be in effect during the Project's examination. Notwithstanding this, if they were to come into effect, the changes being introduced for the stages post acceptance are not envisaged to cause issues: modifications to the Judicial Review process will shorten the front end of this process; it is not clear whether the process for modifying DCOs will have any impact other than procedural; and the introduction of Environmental Delivery Plans are an opt in process. The introduction of mandatory timelines for NPS updates is not a concern as new NPS' relevant to the Project have been consulted on as recently as April 2025 and are anticipated to come into force during the Examination. |
| | Applications | |
| 4.2.12 | Applicants must ensure that applications are ready to be examined before an application is made. The Planning Act 2008 system is designed to be frontloaded and applications should not enter the statutory system if they are not ready to be consented. Examining Authorities, and indeed Secretaries of State, should be focused on considering the planning merits of an application, and not | National Grid has front-loaded the application through extensive engagement with all relevant parties, as detailed in the **Consultation Report [APP-066]**. The planning merits of the application are clearly set out in the **Planning Statement [APP-085]**.<br>National Grid has included protective provisions for the benefit of Electricity, Gas, Water and Sewage Undertakers, |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | using time during the examination and decision-making stages seeking to address deficiencies in an application. Applicants and affected parties should ensure that protective provisions have been agreed ahead of statutory deadlines. | Electronic Communications Operators as well as for the benefit of National Highways, Local Highways Authorities and Internal Drainage Boards/Flood Authorities (see Parts 1 to 5 of Schedule 16 to the draft Development Consent Order). In addition National Grid is working closely with relevant stakeholders who wish to have bespoke Protective Provisions for their named benefit in the Order. It is envisaged that these matters will be settled in accordance with statutory deadlines where possible. Where agreement on protective provisions cannot be reached before those statutory deadlines, National Grid will make such written and oral submissions as are necessary and required in order to demonstrate compliance with Sections 127 and 138 of the Planning Act 2008. |
| | Environmental Statements | |
| 4.2.13 | Applicants and their consultants and advisors must ensure that their applications are clear and accessible to both the public and decision makers. Applications should be proportional, clear and focused in order to ensure the planning process can move at the pace required to meet the Clean Power 2030 Mission. Applicants must ensure their applications are concise whilst still containing the necessary, high quality, information the Examining Authority, statutory consultees and the Secretary of State expect to see in order to make an informed decision. The ES should therefore be proportionate and focused, with just the sufficient detail required to clearly identify the likely significant effects from the proposal. | National Grid consider that the submitted application is clear, proportionate and focussed. The geographical scale of the Project means that inevitably a large amount of information has been submitted as part of the application, however this information is deemed necessary for decision makers to make an informed decision. The use of tables, bullet points and summaries seek to make the information submitted accessible to the end user. |
| | Working together | |
| 4.2.14 | With the increasing number of development consent applications coming forward, this will put pressure on existing systems within the NSIP regime. It's therefore | As per the **Consultation Report [APP-066]** and relevant Draft Statements of Common Grounds, National Grid has |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | important that all parts of the system work together cohesively to ensure that the impacts of projects are properly assessed and mitigated so that good quality schemes are consented. LPAs and statutory advisors need the best and most assessable information from applicants so that they can easily identify all the relevant issues, agree the majority of those early and focus their attention on any controversial issues. Applicants providing tracked | engaged extensively with relevant LPAs and statutory consultees.<br>Regular thematic meetings and workshops have been held to explain the project from inception through to the final DCO design. National Grid will continue to engage with LPAs and statutory advisors as relevant throughout the examination process, and should consent be granted, through the construction period. |
| | Similarly, applicants, consultees, examiners and decision makers, and all their legal teams must work together to streamline the formal DCO itself. Applicants should seek to take a standard approach to issues like compulsory purchase powers, the discharge of requirements and arbitration. Applicants should not introduce subtle changes to make a development easier to carry out and standard articles, such as those on human remains and mineral rights should only be used where there is a known burial ground or mineral rights holder. | |
| | The critical national priority | |
| 4.2.~~5~~16-4.2.18 | Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure to meet the Clean Power 2030 Mission and net zero. Paragraphs 4.2.17 and 4.2.18 below set out the projects to be prioritised for the Clean Power 2030 Mission and net zero. The CNP policy below applies to these projects. This does not extend the definition of what counts as nationally significant infrastructure: the scope remains as set out in the Planning Act 2008. ~~Low carbon infrastructure for the purposes of this policy means: for~~Low carbon infrastructure for the purposes of this policy means, for electricity generation, all onshore and offshore generation that does not involve fossil fuel combustion | The Project is a proposal by National Grid to reinforce the high voltage power network in East Anglia. The reinforcement is needed because the existing transmission network, even with current upgrading, will not have sufficient capacity for the new renewable energy (a substantial proportion of which is generated by offshore wind) that is expected to connect to the network over the next 10 years and beyond. Completion of the Project, together with other new reinforcements across the country, will meet this future energy transmission demand both in East Anglia and across the UK.<br>The Project is identified a National Significant Infrastructure Project (in accordance with Part 3, Section 14(1)(b) and |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | (that is, renewable generation, including anaerobic digestion plants provided they meet existing definitions of low carbon; and nuclear energy generation), as well as natural gas fired generation which is carbon capture ready. EfW developments are not critical to meeting the Clean Power 2030 Mission and therefore CNP policy does not apply to applications for EfW projects. For electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those associated specifically with a particular generation technology, as all new grid ~~Projects~~projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System. Other energy infrastructure, fuels, pipelines and storage infrastructure, which fits within the normal definition of "low carbon", such as hydrogen distribution, and carbon dioxide distribution are also classed as low carbon infrastructure for the purposes of this policy.<br>• Low carbon infrastructure for the purposes of this policy also means energy infrastructure which is directed into the NSIP regime under section 35 of the Planning Act 2008, and fit within the normal definition of "low carbon", such as interconnectors, Offshore Hybrid Assets, or 'bootstraps' to support the onshore network which are routed offshore. In addition to lifetime extensions of nationally significant low carbon infrastructure, and repowering of projects. | Section 16(1)(a) of the Planning Act 2008). The Project is Critical National Priority Infrastructure being electricity grid infrastructure within the scope of CNP as set out in paragraph 4.2.~~5~~16.<br>The **Planning Statement [APP-085]** explains that the Project is CNP infrastructure as defined in NPS EN-1. Without reinforcement, the capacity of the existing network in East Anglia and the South East is insufficient to accommodate the connection of proposed new power sources connecting in the area. As such, the Project is considered to be a means of all of the following:<br>• Connecting a new generating station or storage facility to the network<br>• Reinforcing the network to accommodate such connections<br>• Reinforcing the network to ensure that it is sufficiently resilient and capacious. |
| 4.2.~~6~~19 - 4.2.~~7~~20 | The overarching need case for each type of energy infrastructure and the substantial weight which should be given to this need in assessing applications, as set out in | The Project is Critical National Policy and the presumption is engaged.<br>The Project has been designed following the mitigation hierarchy. At the routeing and siting stage, the Project |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | paragraphs 3.2.6 to 3.2.8 of EN-1, is the starting point for all assessments of energy infrastructure applications.<br>The CNP policy **does not** create an additional or cumulative need case or weighting to that which is already outlined for each type of energy infrastructure. The policy applies following the normal consideration of the need case, the impacts of the ~~Project~~project, and the application of the mitigation hierarchy. As such, it is relevant during Secretary of State decision making and specifically in reference to any residual impacts that have been identified. It should therefore also be given consideration by the Examining Authority when it is making its recommendation to the Secretary of State. | design process was informed by the Holford and Horlock Rules to avoid impacts where possible. These established guidelines informed the evaluation criteria and how the mitigation hierarchy was applied during the options selection process.<br>The mitigation hierarchy is a key component of the Environmental Impact Assessment Process. **ES Chapter 5: EIA Approach and Method [APP-135]** describes the mitigation hierarchy as a stepped process that helps development projects to address potentially adverse impacts on the environment.<br>The adopted design approach is set out within **ES Chapter 3: Alternatives [APP-127]** which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the application for development consent.<br>The **ES [APP-123** to **APP-298]**, **Design Development Report [APP-122]** and the **Planning Statement [APP-085]**, **Design and Access Statement [APP-353]** and **Design Approach to Site Specific Infrastructure [APP-355]** demonstrate that the mitigation hierarchy has been applied throughout the design and development of the Project.<br>Chapter 8 of the **Planning Statement [APP-085]** presents the planning balance explaining the weight given to the adverse impacts of the Project and its benefits and the application of the CNP related policies to the Project. |
| 4.2.~~8~~22 | 4.2.22 During decision making, the CNP policy ~~will influence how non-HRA and non-MCZ residual impacts are considered in the planning balance. The policy will therefore~~ also ~~influence how~~explains the Secretary of ~~State considers whether~~State's approach to HRA derogations and MCZ assessments. Specifically, the policy explains | To support the SoS with its duties under the Conservation of Habitats and Species Regulations 2017 (as amended) and in accordance with planning policy, a Habitats Regulations Assessment (HRA) Report has been prepared **[APP-082APP-082]**. It forms part of the application for a Development Consent Order (DCO) for the Project |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | how the alternative solutions and IROPI tests ~~requiring clear outweighing of harm, exceptionality, or very special circumstances have been met~~ are considered by ~~a CNP Infrastructure application.~~the Secretary of State. Further detail is provided in paragraphs 4.2.~~15~~31 to 4.2.~~17~~35, and Figure ~~2.~~3. Further detail on wider HRA and MCZ policy are provided in Section 5.4 of this NPS. | submitted to the Secretary of State for Department for Energy Security and Net Zero (the 'Secretary of State'), under Section 37 of The Planning Act 2008 and is submitted to inform the Secretary of State's HRA of the Project. The DCO application demonstrates that the Project does not result in any HRA or MCZ residual impacts. Therefore, there is no need for the SoS to consider making a derogation under the Habitats Regulations and the presumption of consent for CNP infrastructure still stands. |
| | Applicant's assessment | |
| 4.2.~~10~~23 | Applicants for CNP infrastructure must continue to show how their application meets the requirements in this NPS and the relevant technology specific NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements. | The **Planning Statement [APP-085]** sets out how the Application meets the requirements of the designated NPS (EN-1, EN-3 and EN-5), whilst the **ES [APP-123** to **APP-298]** assesses the potential environmental impacts of the Project.<br>The **ES [APP-123 to APP-298)** demonstrates that the mitigation hierarchy has been applied throughout the design and development of the Project.<br>The **Design Development Report [APP-122]**, **ES Chapter 3: Alternatives [APP-127]**, **Design and Access Statement [APP-353]** and **Design Approach for Site Specific Infrastructure [APP-354]** provide an overview of the design rationale for the Project. It outlines how the design choices have sought to reduce the environmental effects of the Project and demonstrates that the design has incorporated mitigation measures in order to avoid or reduce significant environmental effects wherever practicable.<br>The **Design Development Report [APP-122]** also explains the changes that were made to the Project as a result of feedback from the consultation process. The process of reviewing and responding to consultation |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | feedback is explained in the **Consultation Report [APP-066].** This includes engagement with Natural England which was undertaken during the statutory consultation and following this with several meetings being held.<br>In line with national policy requirements, the Project has been designed following the mitigation hierarchy and has avoided impacts where possible through the routeing and siting process. Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features as far as reasonably practicable.<br>National Grid has embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project. Embedded measures are those that are intrinsic to and built into the design of the Project.<br>The **Outline Code of Construction Practice (CoCP) [APP-300**] details the embedded measures and additional mitigation measures that have been identified through the Environmental Impact Assessment to avoid or reduce likely significant environmental effects. The **Outline CoCP [APP-300]** as secured by Requirement 6 of Schedule 3 of the **Draft DCO [APP-056]**, records all the commitments made by National Grid during the iterative development of the designs of the Project. |
| 4.2.~~11~~24 | 4.2.24 Applicants must apply the mitigation hierarchy and demonstrate that it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated. Measures that | See response to 4.2.~~10~~23. The Mitigation Hierarchy has been applied through the evolution of the Project.<br>Statements of Common Ground (SoCG) have been prepared with **Natural England [APP-101]** as the SNCB. Other SoCG relevant to this policy include: |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | result in a significant reduction in generation capacity for CNP infrastructure are unlikely to be considered to be appropriate as mitigation. There may be exceptional circumstances where the mitigation could have a significant benefit and warrant a small reduction in generation capacity and function. In these circumstances, the Secretary of State may decide that the benefits of the mitigation to reduce the effects outweigh the marginal loss of function. | • **Environment Agency [APP-103]**<br>• **Norfolk Wildlife Trust [APP-105]**<br>• **Suffolk Wildlife Trust [APP-106]**<br>• **Essex Wildlife Trust [APP-107]** |
| 4.2.~~12~~25 | ~~Applicants~~Compensation, by definition, does not reduce an adverse effect resulting from a development. However, applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success~~,~~ and that action is taken. Changes to measures may be needed e.g. adaptive management. The cumulative impacts of multiple developments with residual impacts should also be considered. | **ES Chapter 18 [APP-287]** identifies which environmental topics would have significant residual effects following the application of mitigation measures. Significant residual effects would be limited to five topic areas: Landscape and Visual, Historic Environment, Agriculture and Soils, Socioeconomics (specific sites), and Traffic and Transport (construction phase only). Six topics would have no significant residual effects..<br>The residual effects that remain following the application of the mitigation hierarchy and any compensation provided then fall to the planning balance in accordance with the NPS policies. Policies relating to Critical National Priority (CNP) projects specifically address residual effects in the planning balance. For CNP infrastructure, EN-1 4.2.15 provides that **these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure.** Revised EN-1 paragraph 4.2.25 confirms that compensation, by definition, does not reduce an adverse effect resulting from a development. NPS EN-5 (2024) paragraph 2.9.11 is also explicit that mitigation is not expected to result in the removal of landscape and visual effects for overhead lines *'and the impossibility of full mitigation in these cases does not countermand the need for overhead lines'.* |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | A list of all mitigation measures to be implemented throughout construction and operation phases with information on how these will be monitored is set out in Table 6.1 of the **Outline CoCP [APP-300]**. Chapter 6 of the Outline CoCP discusses the potential effects, mitigation measures, environmental commitments and monitoring relating to each of the ES topics and notes the topic specific documents where these matters are discussed in more detail.<br>Section 7.2 of the Outline CoCP details how measures will be reported on.<br>National Grid's approach to compensation is set out in Chapter 7 of the **Planning Statement [APP-085]**. |
| 4.2.~~13~~26 | Where residual impacts relate to HRA or MCZ sites then the Applicant must provide a derogation case, if required, in the normal way in compliance with the relevant legislation and guidance. | A **Habitats Regulations Assessment Report [APP-082]** has been prepared. The Project does not result in any HRA residual impacts. Therefore, there is no need for the SoS to consider making a derogation under the Habitats Regulations and the presumption of consent for CNP infrastructure still stands. |
| | **Secretary of State decision making** | |
| 4.2.~~14~~27 | The Secretary of State will continue to consider the impacts and benefits of all CNP Infrastructure applications on a case-by-case basis. The Secretary of State must be satisfied that the applicant's assessment demonstrates that the requirements set out above have been met. Where the Secretary of State is satisfied that they have been met, the CNP presumptions set out below apply. | National Grid is satisfied that that the requirements have been clearly met and the CNP presumptions therefore apply. The basis to this is set out in the **Planning Statement [APP-085]**. |
| | **Non-HRA and non-MCZ residual impacts of CNP Infrastructure** | |
| 4.2.~~15~~28 | Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this | The **Planning Statement [APP-085]** sets out that the Project is CNP Infrastructure. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts. The exception to this presumption of consent are residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence~~,~~ or irreplaceable habitats ~~or unacceptable risk to the achievement of net zero~~. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk. | The **Planning Statement [APP-085]** demonstrates through cross reference to **ES Chapter 10: Health and Wellbeing [APP-192]**, **ES Chapter 9: Contaminated Land, Geology and Hydrogeology [APP-181]** and **ES Appendices 6.9.A1: Baseline Information and Preliminary Contaminated Land Risk Assessment [APP-182]**, **Groundwater Baseline and Qualitative Groundwater Risk Assessment [APP-184]**, **Traffic and Transport Construction Effects [APP-275]**, **Flood Risk Assessment [APP-331]**, **Outline Construction Traffic Management Plan [APP-309]**. **Electric and Magnetic Field Compliance Report [APP-330]** and the **Statement of Statutory Nuisance [APP-083]** that the Project will not present an unacceptable risk to, or unacceptable interference with human health and public safety.<br>The **Planning Statement [APP-085]** with reference to **ES Appendix 6.15: Summary of Aviation Impact [APP-267]** that the Project will not present an unacceptable risk to defence.<br>The **Ancient Woodland and Veteran Tree Strategy [APP-323]** outlines the principal measures that are required to help avoid, minimise, and compensate for the potential ecological effects of the Project on ancient woodland and veteran trees, during and post construction, as per the mitigation hierarchy. Specific Project commitments have been made as standard mitigation, to remove impacts to ancient woodlands. No works will be undertaken (in line with Project commitments B20-B24 set out within the **Outline CoCP [APP-300]**) within or within 15 m of these ancient woodlands. Impacts have also been reduced at one ancient woodland (Rivenhall Thicks) by Project commitment B25, set out within the **Outline CoCP [APP-300]**. |
| 4.2.~~16~~29 | As a result, the Secretary of State will take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. | |
| 4.2.~~17~~30 | This means that the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests:<br>• where development within a Green Belt requires very special circumstances to justify development;<br>• where development within or outside a Site of Special Scientific Interest (SSSI) requires the benefits (including need) of the development in the location proposed to clearly outweigh both the likely impact on features of the site that make it a SSSI, and any broader impacts on the national network of SSSIs.<br>• where development in nationally designated landscapes requires exceptional circumstances to be demonstrated; and | |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | • where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional. | A total of 112 trees and four groups have been surveyed within the Project Study Area as veterans. Four individual veteran trees require removal, while 15 veteran trees and two veteran groups require crown management.<br><br>Complete removal of impacts to the four ancient woodlands and Rivenhall Thicks (and the associated 15 m buffer) are unavoidable, as the proposed works relate to the removal, undergrounding or modification of existing third-party infrastructure (11 kV, 33 kV, 132 kV), with the existing assets already located within the associated woodland or 15 m root protection area.<br><br>With regard to Net Zero, it is considered that the Project makes a significant contribution to Net Zero by providing significant reinforcements to the transmission system which will facilitate the connection of future sources of renewable and low carbon power generation along the coast and therefore will facilitate the achievement of Net Zero The Project therefore does not present a risk to the achievement of Net Zero.<br><br>A **FRA Flood Risk Assessment (FRA) [APP-331]** has been submitted as part of the application for development consent focussing on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. The Project does not present an unacceptable risk to, or unacceptable interference to flood risk.<br><br>Paragraph 4.2.17 includes a non-exhaustive list of such tests. Section 7 of the Planning Statement sets out how the Project has met these tests.<br><br>The Project does include proposals for development within the Metropolitan Green Belt. The works include an overhead line comprising standard and low height pylons, a new Tilbury North Substation and new Cable Sealing End (CSE) compounds. As outlined in Chapter 7 of the |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | **Planning Statement [APP-085]**, National Grid deems that the proposed overhead line comprises an engineering operation and should therefore not be regarded as inappropriate development in the Green Belt provided that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.<br><br>Notwithstanding the above, even if the overhead lines were considered to be inappropriate development (which is not accepted by the Applicant as set out in **5.6 Planning Statement [APP-085]**), it is nevertheless considered that there are very special circumstances which justify their acceptability. Paragraphs 7.3.497 to 7.3.537 of the **5.6 Planning Statement [APP-085]** consider the Project's compliance with Green Belt policy.. It is National Grid's position that the proposed Tilbury North Substation and CSE compounds may be considered to be inappropriate development in the Green Belt. The **Planning Statement [APP-085]** sets out the very special circumstances to justify this development in the Green Belt.<br><br>Through careful routeing and siting the Project avoids all direct impacts on Sites of Special Scientific Interest. **ES Chapter 8: Ecology and Biodiversity [AS-026]** identifies and considers the impact of the Project on SSSIs. Following the application of mitigation set out in the **Outline CoCP [APP-300]** it is concluded that there would be no significant residual effect on Flordon Common SSSI. No potential for adverse effects on other SSSI is expected.<br><br>A **Habitats Regulations Assessment Report [APP-082APP-082]** has been prepared. The Project does not result in any HRA or MCZ residual impacts. Therefore, there is no need for the SoS to consider making a derogation under the Habitats Regulations and the presumption of consent for CNP infrastructure still stands. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | The Project is routed through the Dedham Vale National Landscape, utilising underground cable technology. Paragraphs 4.2.17 and 5.10.32 in NPS EN-1 confirm that development consent in nationally designated landscapes can only be granted in exceptional circumstances and should be demonstrated to be in the public interest. Paragraph 5.10.33 of NPS EN-1 confirms that the SoS should ensure that any Projects consented in these designated areas should be carried out to high environmental standards. The Project meets the tests set out in Paragraph 5.10.32, as discussed below:<br><br>The need for the development is set out in the **Strategic Options Backcheck and Review [APP-355]** and **Planning Statement [APP-085]** which explains how the Project will reinforce the transmission network in East Anglia. The need for which is already stated in Paragraph 3.3.68 of NPS EN-1.<br><br>The cost of, and scope for, developing outside the National Landscape or meeting the need in some other way has been considered as part of the evolution of the Project.<br><br>**ES Chapter 3: Alternatives [APP-127]** describes the routeing decision made by National Grid to route directly through the Dedham Vale National Landscape (using underground cables) or take a longer route around it. The direct route with underground cables was selected as it halves the connection length, avoids creating a third connection between Bramford and Twinstead, and better complies with the Holford Rules, despite requiring underground cable mitigation through the National Landscape.<br><br>And permanent detrimental effect on the environment, the landscape and recreational opportunities within the National Landscape have been avoided through |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | undergrounding and careful consideration of routeing and siting through the National Landscape.<br>On the basis of the above, exceptional circumstances therefore exist to justify the proposed development in the Dedham Vale National Landscape. As demonstrated by the needs case, the Project would be in the public interest.<br>The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on cultural heritage and archaeology assets. The Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 which take as a starting point that CNP infrastructure will be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Based on the above, it is established that in the case of the Project, that any tests which require a clear outweighing or harm, exceptionally or in very special circumstances have been met. National Grid has set out in Chapter 8 of the **Planning Statement [APP-085]** that the benefits of the Project clearly and demonstrably outweigh residual adverse effects after the implementation of mitigation measures. The Project is in accordance with the Energy NPSs and the CNP presumption of consent is firmly engaged. |
| | **HRA derogations and MCZ assessments for CNP Infrastructure** | |
| 4.2.~~18~~31 | Any HRA or MCZ residual impacts will continue to be considered under the framework set out in the Habitats | To support the SoS with its duties under the Conservation of Habitats and Species Regulations 2017 (as amended) |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | Regulations and the Marine and Coastal Access Act 2009 respectively. | and in accordance with planning policy, a Habitats Regulations Assessment (HRA) Report has been prepared **[APP-082]**.<br>The HRA comprises Stage 1: Screening and Stage 2: Appropriate Assessment. It builds on the Draft HRA Screening Report has concluded that there will be not significant adverse effects of the integrity of a European Site (following the implementation of mitigation).<br>There were 28 European Sites identified within the Study Area for the HRA Report. No likely significant effects were identified for 23 sites which were screened out at the pre-screening stage. Five sites were taken forward for detailed screening, no likely significant effects were identified for the Thames Estuary and Marshes SPA and Ramsar Site.<br>Stage 1 of the HRA process identified the potential for Likely Significant Effects (on its own or in-combination effects with other plans or projects) on three European sites:<br>• Norfolk Valley Fens SAC<br>• Stour and Orwell Estuaries Ramsar Site<br>• Stour and Orwell Estuaries SPA.<br>The potential LSEs relate to construction activities. All operation (and maintenance) LSEs have been screened out.<br>In the absence of mitigation, direct LSEs through changes in hydrology could not be screened out for the Norfolk Valley Fens SAC or the Stour and Orwell Estuaries SPA and Ramsar Site.<br>In the absence of mitigation, indirect LSEs through temporary land loss, fragmentation of habitat, disturbance (through noise, vibration, light and movement), changes in air quality and changes in hydrology could not be screened |
| 4.2.~~19~~32 | Where, following Appropriate Assessment, CNP Infrastructure has residual adverse impacts on the integrity of sites forming part of the UK national site network, either alone or in combination with other plans or Projects, the Secretary of State will consider making a derogation under the Habitats Regulations. | |
| 4.2.~~21~~343 | For both derogations, the Secretary of State will consider the particular circumstances of any plan or Project, but starting from the position that energy security and decarbonising the power sector to combat climate change:<br>• requires a significant number of deliverable locations for CNP Infrastructure and for each location to maximise its capacity. This NPS imposes no limit on the number of CNP infrastructure Projects that may be consented. Therefore, the fact that there are other potential plans or Projects deliverable in different locations to meet the need for CNP Infrastructure is unlikely to be treated as an alternative solution. Further, the existence of another way of developing the proposed plan or Project which results in a significantly lower generation capacity is unlikely to meet the objectives and therefore be treated as an alternative solution; and<br>• are capable of amounting to imperative reasons of overriding public interest (IROPI) for HRAs, and, for MCZ assessments, the benefit to the public is capable of outweighing the risk of environmental damage, for CNP Infrastructure | |
| 4.2.~~22~~35 | For HRAs, where an applicant has shown there are no deliverable alternative solutions, and that there are IROPI, compensatory measures must be secured by the Secretary | |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | of State as the competent authority, to offset the adverse effects to site integrity as part of a derogation. For MCZs, where an applicant has shown there are no other means of proceeding which would create a substantially lower risk, and the benefit to the public outweighs the risk of damage to the environment, the Secretary of State must be satisfied that measures of equivalent environmental benefit will be undertaken. | out at FLL for the waterbird assemblage qualifying feature of the Stour and Orwell Estuaries SPA and Ramsar Site. Two areas of FLL are present within the Order Limits, which have been used by significant numbers of roosting Lapwing and Golden Plover which are part of the waterbird assemblage of the Stour and Orwell Estuaries SPA and Ramsar Site. In the absence of mitigation, LSEs through temporary land loss, fragmentation of habitat, disturbance (through noise, vibration, light and movement) and changes in air quality could not be screened out for the waterbird assemblage qualifying feature of the Stour and Orwell Estuaries SPA and Ramsar Site. This is due to the presence of two areas of FLL within the Order Limits, which have been used by significant numbers of roosting lapwing and golden plover which are part of the waterbird assemblage of the Stour and Orwell Estuaries SPA and Ramsar Site.<br><br>The Appropriate Assessment concluded there would be no adverse effects on the integrity of the Norfolk Valley Fens SAC and the Stour and Orwell Estuaries SPA and Ramsar Site with regard to hydrology once mitigation measures within the **Outline CoCP [APP-300]**, secured through Requirement 4 of the **Draft DCO [APP-056]** are implemented. This includes direct and indirect (through FLL) effects at the Stour and Orwell Estuaries SPA and Ramsar Site.<br><br>The Appropriate Assessment concluded there would be no adverse effects on the integrity of the Stour and Orwell Estuaries SPA and Ramsar Site with regard to air quality on FLL associated with the waterbird assemblage qualifying feature. This is primarily due to the FLL consisting of arable habitat which is not considered to be vulnerable to effects air quality effects. Furthermore, the |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | Outline Dust Management Plan, appended to the **Outline CoCP APP-304]**, secured through Requirement 4 of the **Draft DCO [APP-056]** will be adhered to during the works. |
| **4.3** | **Environmental Effects/Considerations** | |
| 4.3.1 – 4.3.3 | All proposals for projects that are subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project.<br>The EIA Regulations specifically refer to effects on population, human health, biodiversity, land, soil, water, air, climate, the landscape, material assets and ~~cultural heritage~~historic environment, and the interaction between them.<br>The EIA Regulations require an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects. | The application for development consent is accompanied by an ES which meets the requirements of EN-1 and EN-5. **ES Appendix 5.2: Scope of the Assessment [APP-137]** outlines the scope of the assessment. This has been informed by the **Scoping Opinion [APP-297]**.<br>The inter-project cumulative assessment presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** included a 'cut-off date' of 1 April 2025 to confirm the long list of cumulative developments to be assessed. However, since 1 April the Applicant has been undertaking monthly reviews of planning registers and Local Planning Authority websites and will continue to do so during the Examination period, to check whether there are any new relevant developments / allocations. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement, these would be published into Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate). |
| 4.3.4 | To consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. This information could include matters such as employment, equality, biodiversity net gain, community cohesion, health and well-being. | The ES provides an assessment of likely significant environmental, social and economic effects arising during construction and operation of the Project.<br>EIA Measures<br>The development of measures to avoid, reduce or compensate for any significant adverse effects of a Project is an intrinsic part of the EIA process and, from the outset, the route selection process described in **ES Chapter 3: Alternatives [APP-127]** sought to take into account |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | environmental constraints and to avoid them as far as possible.<br>Generally, there are three types of design measures implemented on the Project; embedded, good practice and mitigation.<br>Embedded measures: Embedded measures are those that are intrinsic to and built into the design of the Project. Table 4.2 of **ES Chapter 4: Project Description [APP-130]** outlines the key embedded measures that have been incorporated into the design to date.<br>Standard Mitigation Measures: National Grid has identified a number of good practice measures, which generally comprise measures imposed through legislative requirements or represent standard sector good practices. These include measures to reduce nuisance from construction activities. The good practice measures are set out in the **Outline CoCP [APP-300]**<br>Additional Mitigation measures and Biodiversity Net Gain: National Grid will deliver net gain by at least 10% or greater in environmental value, including BNG, on this Project. Further details can be found in the **Biodiversity Net Gain Report [APP-299]**.<br>The ES has identified locations where additional mitigation is proposed to avoid or reduce likely significant effects following the assessment undertaken in each of the topic chapters. The Environment Act 2021 includes a requirement for Nationally Significant Infrastructure Projects (NSIPs) to deliver at least 10% biodiversity net gain from November 2025. As addressed below NPS EN-1 also states that '*Although achieving biodiversity net gain is not an obligation on applicants, Schedule 15 of the Environment Act 2021 contains provisions which, when commenced, mean the Secretary of State may not grant an* |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | *application for a Development Consent Order unless satisfied that a biodiversity gain objective is met in relation to the onshore development in England to which the application relates*' (Paragraph 4.6.1). |
| 4.3.5 | For the purposes of this NPS and the technology specific NPSs the ES should cover the environmental, social and economic effects arising from pre-construction, construction, operation and decommissioning of the project. | The ES provides an assessment of likely significant environmental effects arising during construction and operation of the Project. **ES Chapter 15: Socio-economics, Recreation and Tourism [APP-265]** presents the existing socio-economic conditions in the Local, 3 km and Wider Study Areas surrounding the Project. The **Planning Statement Chapter 7 [APP-085]** provides an assessment of the environmental, social and economic impacts of the Project from a planning perspective. |
| 4.3.9 | As in any planning case, the relevance or otherwise to the decision-making process of the existence (or alleged existence) of alternatives to the proposed development is, in the first instance, a matter of law. This NPS does not contain any general requirement to consider alternatives or to establish whether the Project represents the best option from a policy perspective. Although there are specific requirements in relation to compulsory acquisition and habitats sites, the NPS does not change requirements in relation to compulsory acquisition and habitats sites. | National Grid undertakes an options appraisal on each new Project. Options appraisal is a robust and transparent process that is used to compare options and to assess the positive and negative effects they may have, across a wide range of criteria including environmental, socio-economic, technical and cost factors. The assessment is documented to provide in a transparent manner, the information on which decisions are based. This is reported in the **Strategic Options Backcheck and Review Report [APP-355]**. Consultation with the relevant stakeholders and community have been carried out to inform the selection of the preferred options. **ES Chapter 3: Alternatives [APP-127]** and The **Design and Access Statement [APP-353]** sets out how the Project has evolved from a concept, through strategic options, route corridors and indicative alignments to the Project presented within the application for development consent. The **Design Development Report [APP-122]** describes how the Project design has developed between Statutory Consultation and submission. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | **Applicant assessment** | |
| 4.3.10 | The applicant must provide information proportionate to the scale of the Project, ensuring the information is sufficient to meet the requirements of the EIA Regulations. | The Application is proportionate to the scale of the Project with regards to the requirements set out in the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations'). The Project constitutes Environmental Impact Assessment (EIA) development as defined in the EIA Regulations. The Project falls within Schedule 1 Paragraph 20 of the EIA Regulations, '*Construction of overhead electrical power lines with a voltage of 220 kV or more and a length of more than 15 km*'.<br>A **Scoping Report [APP-288 to APP-296]** was submitted to the Planning Inspectorate on 4 November 2022. This set out the parameters of the Project, the proposed methodology for undertaking the environmental assessment and the proposed scope of the EIA. It also identified the potentially significant environmental effects (as identified at that time) that would be assessed in more detail (i.e. scoped into the assessment), as well as those that were unlikely to be significant and could therefore be scoped out of the assessment.<br>Further details on the EIA process and methodology can be found in **ES Chapter 5: EIA Approach and Method [APP-135]**. |
| 4.3.11 | In some instances, it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case. | **ES Chapter 3: Alternatives [APP-127]** explains that the assessment of likely significant effects in this ES (Volume 6 of the DCO application) is based on the description of the design, construction, and operation (and maintenance) of the Project presented in this chapter and on **Figure 4.1: Proposed Project Design [APP-133]** and **Figure 4.2: Proposed Project Design – Permanent Features [APP-134]**. Consideration has also been given to the potential for |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | variation in the description of individual components of the Project.<br>The environmental topic chapters consider sensitivity testing / flexibility in design that may be adopted to see if there would be new or different significant effects. Sensitivity testing / flexibility in design is assessed within Section 9 of each environmental topic chapter (Chapters 6 to 16 [**APP-138 to APP-APP-271]**) and includes:<br>Flexibility in construction programme:<br>• Assessment of an alternative delays to the construction schedule: Each environmental topic chapter provides an assessment to determine if the environmental effects would be different if the construction programme was delayed<br>Flexibility in Design:<br>• Flexibility within the Limits of Deviation (LoD), for example changes to the location or height of permanent features, such as pylons, within the LoD (other than where locations of pylons are committed to which isas detailed within the **Outline CoCP [APP-300]**)<br>• Flexibility within Order Limits, for example there are elements of the Project where uncertainty remains and a design flexibility alternative has been identified. To assess the potential effects of these elements, a single scenario is assessed within Section 7 with an assessment of the flexibility an alternative design scenario presented in Section 9 of each environmental topic chapter. Further detail is presented in Table 4.4 as to how each element has been assessed within the ES (Volume 6 of the DCO application).<br>The Order Limits include the LoD, which represent the maximum deviation for permanent infrastructure, such as |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | the overhead line, pylons and underground cable and are shown on the **Work Plans [APP-017 to APP024]**. The assessment presented within the ES is based on the 'Proposed Alignment', which is shown in **ES Figure 4.1: Proposed Project Design [APP-133]**.<br>The LoD allow for adjustment to the final positioning of the permanent infrastructure; for example, to avoid localised constraints or unknown or unforeseeable issues that may arise. This could include previously unidentified poor ground conditions which may require a pylon to be moved slightly for geotechnical reasons, such as ground stability. |
| 4.3.12 | Where some details are still to be finalised, the ES should, to the best of the applicant's knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the Project as it may be constructed have been properly assessed. | Where details are still to be finalised, the ES assess the effects of the Project against the maximum extent of the proposed development. Section 9 of the ES topic chapters **[APP-123 to APP-271]** covers flexibility in design or construction and sensitivity testing. This outlines any new or different significant effects that may occur through the application of flexibility that is allowed for within the **Draft DCO [APP-056]** compared to the baseline scenario presented in the earlier sections of the topic chapter. The flexibility allows for micro-siting of pylons and the alignment of the 400 kV overhead line within the LoD during detailed design and construction, without triggering the need to revise the EIA. Further details regarding what is included within the baseline scenario and within the sensitivity assessment can be found in **ES Chapter 4: Project Description [APP-130]**. |
| 4.3.15 – 4.3.16 | Applicants are obliged to include ~~in their ES~~, information about the reasonable alternatives they have studied in their ES. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility. | The Infrastructure Planning (EIA) Regulations requires applicants to document alternative development options considered as part of the application for development consent. Part 1 of Schedule 4 of the EIA Regulations requires that the ES includes an outline of the main alternatives studied by National Grid and an indication of |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | In some circumstances, the NPSs may impose a policy requirement to consider alternatives. | the main reasons for National Grid's choice, taking into account the environmental effects. It is also noted that the NPS requires the ES to describe how the social, economic and environmental effects have been taken into account when making decisions between alternatives. **ES Chapter 3: Alternatives [APP-127]** includes an assessment of alternatives, and environmental considerations in choosing a preferred option and route.<br>Alternatives are also a requirement of the **Habitats Regulations Assessment Report [APP-082]** however, only if adverse effects on the integrity of European sites are identified at the Appropriate Assessment stage (Stage 2). As stated, the Habitats Regulations Assessment Report confirms that Stage 2 Appropriate Assessment found no adverse effect on the integrity of the SPA and Ramsar Site would occur once mitigation measures identified in the **Outline CoCP [APP-300]** are employed. Hence, the Project is not required to consider alternatives under the Habitats Directive. |
| 4.3.17 | Where there is a policy or legal requirement to consider alternatives, the applicant should describe the alternatives considered in compliance with these requirements. | The Infrastructure Planning (EIA) Regulations requires applicants to document alternative development options considered as part of the application for development consent. **ES Chapter 3: Alternatives [APP-127]** includes an assessment of alternatives setting out the environmental considerations in choosing a preferred option and route. Chapter 5 of the **Planning Statement [APP-085]** sets out how planning policy, namely EN-1 and EN-5, as well as the requirements of the Electricity Act and the principles of the Holford and Horlock Rules have influenced the options appraisal process, demonstrating how such policy objectives have been embedded into the design of the Project. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | **Secretary of State decision making** | |
| 4.3.18 | The Secretary of State should consider the worst-case impacts in its consideration of the application and consent, providing some flexibility in the consent to account for uncertainties in specific Project details. | The assessment presented within Sections 7: Residual Effect of each ES topic chapter **[APP-123 to APP-298]** identifies the likely significant effects based on a reasonable worst case. In addition, ES Chapter 17: **Cumulative Effects [APP-281]** assesses the intra-project and inter-project effects. This assessment is based on the construction method described in ES Chapter 4: **Project Description [APP-130]** and the Proposed Alignment that is shown on ES Figure 4.1: **Proposed Project Design [APP-133]**. However, it should be noted that the permanent aspects of the Project, including pylon locations, are not fixed and could be located anywhere within the LoD, as defined on the **Work Plans [APP-017 to APP024]**. |
| 4.3.19 | The Secretary of State should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy, or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place. | **ES Chapter 17: Cumulative Effects [APP-281]** and the accompanying appendices **[APP-282 to APP-284]** detail the Cumulative Effects Assessment for the Project. This includes an assessment of effects on the environment, local economy and community receptors.<br>The inter-project cumulative assessment presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** included a 'cut-off date' of 1 April 2025 to confirm the long list of cumulative developments to be assessed. However, since 1 April the Applicant has been undertaking monthly reviews of planning registers and Local Planning Authority websites and will continue to do so during the Examination period, to check whether there are any new relevant developments / allocations. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement, these would be published |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | into Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate). |
| 4.3.20 | ~~The Government has set 13~~Thirteen legally binding targets have been set for England under the Environment Act 2021, covering the areas of: biodiversity; air quality; water; resource efficiency and waste reduction; tree and woodland cover; and Marine Protected Areas~~.~~ (MPAs). Meeting the legally binding targets will be a shared endeavour that will require a whole of government approach to delivery. The Secretary of State should have regard to the ambitions, goals and targets set out in the ~~Government's~~government's Environmental Improvement Plan ~~2023~~ for improving the natural environment and ~~heritage~~enjoyment of nature. This includes having regard to the achievement of statutory targets set under the Environment Act. | The Project is compliant with the Environment Act 2021 insofar as it is relevant to the Project. Where relevant to the Project, all these topics are covered in full in the ES. Policy on these topics is provided in the designated and proposed revised NPS, which provide policy directly relevant to the development of NSIP. |
| 4.3.22-4.3.29 | Given the level and urgency of need for new energy infrastructure, the Secretary of State should, subject to any relevant legal requirements (e.g. under the Habitats Regulations) which indicate otherwise, be guided by the following principles when deciding what weight should be given to alternatives:<br>• the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner; and<br>• only alternatives that can meet the objectives of the proposed development need to be considered.<br>The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate | **ES Chapter 3: Alternatives [APP-127]** includes an assessment of alternatives setting out the environmental considerations in choosing a preferred option and route. Chapter 7 of the **Planning Statement [APP-085]** sets out how planning policy, namely EN-1 and EN-5, have influenced the options appraisal process; demonstrating how such policy objectives have been embedded into the design of the Project. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | change, and other environmental benefits) in the same timescale as the proposed development<br>The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals.<br>Alternatives not among the main alternatives studied by the applicant (as reflected in the ES) should only be considered to the extent that the Secretary of State thinks they are both important and relevant to the decision.<br>As the Secretary of State must assess an application in accordance with the relevant NPS (subject to the exceptions set out in section 104 of the Planning Act 2008), if the Secretary of State concludes that a decision to grant consent to a hypothetical alternative proposal would not be in accordance with the policies set out in the relevant NPS, the existence of that alternative is unlikely to be important and relevant to the Secretary of State's decision.<br>Alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.<br>Alternative proposals which are vague or immature can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.<br>It is intended that potential alternatives to a proposed development should, wherever possible, be identified | |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | before an application is made to the Secretary of State (so as to allow appropriate consultation and the development of a suitable evidence base in relation to any alternatives which are particularly relevant). Therefore, where an alternative is first put forward by a third party after an application has been made, the Secretary of State may place the onus on the person proposing the alternative to provide the evidence for its suitability as such and the Secretary of State should not necessarily expect the applicant to have assessed it. | |
| **4.4** | **Health** | |
| 4.4.1 | Energy infrastructure has the potential to impact on the health and ~~well-being~~wellbeing ("health") of the population. Access to energy is clearly beneficial to society and to our health as a whole. However, the construction of energy infrastructure and the production, distribution and use of energy may have negative impacts on some people's health. | **ES Chapter 10: Health and Wellbeing [APP-192]** details the assessment of the potential residual effects of the Project on Health and Wellbeing. The chapter covers an assessment of construction and operational (including maintenance) effects on:<br>• Health related environmental change (for example air quality, noise, traffic and transport related effects)<br>• Mental health and wellbeing<br>• The perceptions of impacts arising from Electric and Magnetic Fields (EMFs) of the Project in relation to mental health and wellbeing.<br>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. **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** includes a specific assessment of the impacts of the Project on mental health and wellbeing during both construction and operation. A cumulative assessment is provided in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281].** Paragraph 17.5.47 identifies that, in a number of instances, |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | adverse effects 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.<br><br>The Applicant recognises that uncertainty while the Project is developed may cause anxiety. The Applicant has sought to reduce potential effects on communities and residents through routeing and design. The Applicant has also sought to reduce concern or uncertainty about the Project through engaging with residents and stakeholders throughout the development of the Project. The Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including letters, phone calls and meetings. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns.<br><br>In relation to Mental Wellbeing Impact Assessment (MWIA) workshops, the Applicant understands from statutory and non-statutory consultation already undertaken that the principal concerns of local residents from a mental health and wellbeing perspective centre around stress and anxiety associated with impacts on quality of life / wellbeing once the Project has been constructed (for example visual impacts on businesses and properties) as well as perceptions of the impacts of electric and magnetic fields on health and wellbeing. **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** has identified opportunities for public awareness raising about electric and magnetic fields, which will form part of |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | measures recommended for affected communities along the proposed route. |
| 4.4.3 | New energy infrastructure may also affect the composition and size of the local population, and in doing so have indirect health impacts, for example if it in some way affects access to key public services, transport, or the use of open space for recreation and physical activity. | **ES Chapter 10: Health and Wellbeing [APP-192]** provide assessments of the likely effects on health and wellbeing that could result from the construction and operation (including maintenance) of the Project. The Project has been designed to follow the mitigation hierarchy as far as practicable, to, in the first instance, avoid or reduce and reduce health and wellbeing impacts through the process of design development.<br>The Project will avoid works within designated open space. An Open Space Assessment is provided in Chapter 7 and **Appendix B of the Planning Statement [APP-085]**. In the case of the Project, there are no increased demands or impacts on open spaces as a result of the operation of the Project. |
| | **Applicant assessment** | |
| 4.4.4 – 4.4.5 | As described in the relevant sections of this NPS and in the technology specific NPSs, where the Project has an effect on humans, the ES should assess these effects for each element of the Project, identifying any potential adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate.<br>The impacts of more than one development may affect people simultaneously, so the applicant should consider the cumulative impact on health in the ES where appropriate. | **ES Chapter 10: Health and Wellbeing [APP-192]** provide assessments of the likely effects on health and wellbeing that could result from the construction and operation (including maintenance) of the Project.<br>The mitigation hierarchy has been applied to the design of Project, to, in the first instance, avoid or reduce and reduce health and wellbeing impacts through the process of design development. This has included sensitive routeing and siting of infrastructure. The Project has avoided sensitive features such as centres of population and community, healthcare, and education facilities, through the corridor and routeing studies.<br>During construction, the Project would comply with the good practice measures within the **Outline CoCP [APP-** |
| 4.4.6 | Opportunities should be taken to mitigate indirect impacts, by promoting local improvements to encourage health and wellbeing~~, this~~. This includes potential impacts on vulnerable groups within society and impacts on those with protected characteristics under the Equality Act 2010, i.e. | |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | those groups which may be differentially impacted by a development compared to wider society as a whole. | **300]** which has a number of measures that would avoid or reduce effects on health.<br>The Project has been designed in accordance with National Grid design standards and will be compliant with the guidelines and policies relating to EMF stated in NPS EN-5 (DESNZ, 2024b), including the ICNIRP guidelines. Compliance with these guidelines and policies mean that the Project will already have designed out potential effects from EMF to a level to meet health and safety standards<br>Cumulative impacts are assessed in **ES Chapter 17: Cumulative Effects [APP-281]**.<br>National Grid have prepared an **Equality Impact Assessment [APP-352]** to assess the Project's potential impacts on vulnerable groups and protected characteristic groups, as defined under the Equality Act 2010. The Equality Impact Assessment demonstrates whether and how National Grid has paid due regard to the needs of protected characteristic groups in line with the Equality Act 2010 and the Public Sector Equality Duty PSED.<br>The assessment has identified that the construction and decommissioning phases may give rise to temporary negative equality impacts, particularly in relation to:<br>• Diversions and closures of Public Rights of Way (PRoW), which may affect older people, disabled people, and those with limited mobility;<br>• Increased construction traffic, which may impact vulnerable road users and those accessing community facilities;<br>• Noise, vibration, and air quality changes, which may differentially affect children, older people, pregnant women, and people with sensory or respiratory conditions; |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | • Visual changes, which may affect neurodivergent individuals sensitive to alterations in their environment.<br>These impacts are not expected to be substantial in nature and are mitigated through embedded design measures, good practice construction management, and additional mitigation where required. The project does not require the compulsory acquisition of residential properties, and no known equality impacts have been identified in relation to land acquisition. |
| | **Secretary of State decision making** | |
| 4.4.7 - 4.4.8 | Generally, those aspects of energy infrastructure which are most likely to have a significantly detrimental impact on health are subject to separate regulation (for example for air pollution) which will constitute effective mitigation of them, so that it is unlikely that health concerns will either by themselves constitute a reason to refuse consent or require specific mitigation under the Planning Act 2008.<br>However, not all potential sources of health impacts will be mitigated in this way, and the Secretary of State may want to take account of health concerns when setting requirements relating to a range of impacts such as noise. | **ES Chapter 10: Health and Wellbeing [APP-192]** provide assessments of the likely effects on health and wellbeing that could result from the construction and operation (including maintenance) of the **Project. ES Chapter 7: Air Quality [APP-147]** and **ES Chapter 14: Noise and Vibration [APP-256]** further details the assessment of potential residual effects of the Project on air (dust, traffic emissions and generator and non-road mobile machinery emissions) and noise (during constructions) respectively.<br>The Project has been designed to follow the mitigation hierarchy as far as practicable, to, in the first instance, avoid or reduce and reduce health and wellbeing impacts through the process of design development. This has included sensitive routeing and siting of infrastructure. The Project has avoided sensitive features such as centres of population and community, healthcare, and education facilities, through the corridor and routeing studies.<br>During construction, the Project would comply with the good practice measures within the **Outline CoCP [APP-300]** which has a number of measures that would avoid or reduce effects on health. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| **4.6** | **Environmental and Biodiversity Net Gain** | |
| 4.6.1 and 4.6.2 | Environmental net gain is an approach to development that aims to leave the natural environment in a measurably better state than beforehand. Projects should therefore not only avoid, mitigate and compensate harms, following the mitigation hierarchy, but also consider whether there are opportunities for enhancements.<br>Biodiversity net gain is an essential component of environmental net gain. Projects in England should consider and seek to incorporate improvements in natural capital, ecosystem services and the benefits they deliver when planning how to deliver biodiversity net gain. | As set out in **ES Chapter 8: Ecology and Biodiversity [AS-026], ES Chapter 11: Historic Environment ([AS-068]**, and **ES Chapter 13: Landscape and Visual [APP-226]**, the Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce adverse impacts through the process of design development, and by embedding measures into the design of the Project.<br>National Grid has committed to deliver at least 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project will achieve a minimum of 10% Biodiversity Net Gain (BNG) (though onsite and offsite BNG) and has undertaken a BNG assessment (based on Natural England's Statutory Biodiversity Metric 2024 version (as of June 2025)) which is presented in the **Biodiversity Net Gain Report [APP-299]**.<br>National Grid's approach is to provide any on-site BNG in a coordinated manner in locations that do not prejudice the siting or routeing of future electricity infrastructure, such as substation extensions or customer connections. This approach is in the best interests of nature and is economical and efficient because it safeguards onsite BNG and means that on-site landscape screening or other environmental mitigation can also contribute towards BNG. Criteria for good design for Energy Infrastructure.<br>Discussions are currently taking place between National Grid and the Waveney and Little Ouse Recovery (WaLOR) scheme (Suffolk Wildlife Trust, 2025), a landscape recovery scheme which is located in the same geographic area as the Project. This project is seeking to deliver a number of BNG units in addition to the delivery of the WaLOR scheme and National Grid have discussed the opportunity to deliver |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | approximately 600 area habitat units. This could comprise a mixture of woodland, other neutral grassland as well as the potential to deliver wetland mosaic habitats. The final mix of units and location will be explored as the WaLOR scheme develops. Suffolk Wildlife Trust have also identified Market Weston Fen a habitat bank in Suffolk that comprises mixed scrub and other neutral grassland. National Grid is currently in discussion with both parties to sign an Expression of Interest and updated details will be provided accordingly.<br><br>Essex Wildlife Trust and National Grid are in discussion with regard to the potential to assist with the requirement of approximately 400 units in Essex, which include other neutral grassland, mixed scrub, individual trees and acid grassland. National Grid will continue to work with Essex Wildlife Trust to identify potential sites as the Project progresses.<br><br>'Environmental Areas' have been identified across the Project as part of on-site mitigation. Multifunctional areas were prioritised providing mitigation or enhancements for different environmental aspects i.e. sites where landscape mitigation and biodiversity gains could be achieved together. National Grid would retain ownership of these Environmental Areas and therefore National Grid can commit to a 30-year habitat management and monitoring plan. The following areas have been identified as 'Environmental Areas' and presented in the **Outline Landscape and Ecological Management Plan (LEMP) [AS-046]:**<br><br>• Land around Norwich Main Substation (areas not included in the Norwich Main Substation Extension Planning application)<br>• Land around EACN Substation |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | • Land around Tilbury North Substation and Tilbury North (Warley Side) and Tilbury North (Tilbury Side) CSE Compounds (with Lower Thames Crossing)<br>• Land around Tilbury North Substation and Tilbury North (Warley Side) and Tilbury North (Tilbury Side) CSE Compounds (without Lower Thames Crossing)<br>• Land around Wenham Grove CSE Compound<br>• Land around Great Horkesley (EACN Side) CSE Compound<br>• Land around Great Horkesley (Tilbury Side) CSE Compound<br>• Land around Fairstead (EACN Side) and Fairstead (Tilbury Side) CSE Compounds. |
| | **Applicant assessment** | |
| 4.6.6 | Energy NSIP proposals, whether onshore or offshore, should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible. | Despite BNG not yet being a mandatory requirement for Nationally Significant Infrastructure Projects (NSIPs), National Grid has committed to deliver at least a 10% Environmental Net Gain on all construction Projects. This includes delivering BNG and, for this Project, National Grid has set a voluntary target of a minimum 10% BNG. The **Biodiversity Net Gain Report [APP-299]** outlines how National Grid will deliver 10% BNG on this Project.<br>In the absence of legal obligation or NSIP-specific guidance, National Grid's approach to BNG for NSIP Projects is to:<br>• Meet the policy requirements within the current NPS<br>• Deliver its corporate commitments to deliver at least 10% BNG with wider benefits<br>• Maximise the benefits and value from consumer funded BNG |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | • Follow the spirit of the TCPA BNG legislation and guidance, including using the Statutory Biodiversity Metric |
| 4.6.7 and 4.6.8 | In England applicants for onshore elements of any development are encouraged to use the latest version of the biodiversity metric to calculate their biodiversity baseline and present planned biodiversity net gain outcomes. This calculation data should be presented in full as part of their application.<br>Where possible, this data should be shared, alongside a completed biodiversity metric calculation, with the Local Authority ~~and~~, Natural England and, where relevant, the EA, for discussion at the pre-application stage as it can help to highlight biodiversity and wider environmental issues which may later cause delays if not addressed. | In the absence of a biodiversity metric specifically designed for NSIPs, the Statutory Biodiversity Metric (Department for Environment, Food and Rural Affairs (Defra), 2024), designed for Town and Country Planning Applications (TCPA), has been and would be used to calculate the Project's baseline and post-development biodiversity value, in order to demonstrate how the Project's BNG commitments can be delivered. It is acknowledged that Defra commenced an open consultation on 28 May 2025 on improving the implementation of biodiversity net gain for nationally significant infrastructure projects. The matters discussed in this consultation include introducing 10% BNG delivery (using the statutory biodiversity metric) for NSIPs from May 2026. As National Grid have already sought to delivery 10% BNG as part of this Project which have been calculated using the statutory biodiversity metric, the outcomes of the consultation are not considered to alter the approach already taken. The biodiversity metric calculates three 'types' of biodiversity units (BU) in three sperate 'modules' of the metric:<br>• Area habitat units<br>• Hedgerow units<br>• Watercourse units<br>**Chapter 3 of the Biodiversity Net Gain Report [APP-299]** provides further details about the methodology used for the Biodiversity Metric. Chapter 4 presents the results of the Biodiversity Metric as part of sharing the data with Interested Parties. |
| 4.6.10 | Biodiversity net gain should be applied after compliance with the mitigation hierarchy and does not change or | This assessment presented in the **Biodiversity Net Gain Report [APP-299]** represents an initial calculation based |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | replace existing environmental obligations~~, although compliance with those obligations will be relevant to the question of the baseline for assessing net gain and if they deliver an additional enhancement beyond meeting the existing obligation, that enhancement will count towards net gain.~~. | on the current stage of the Project and would be updated and refined at key milestones to further develop the forecast for net biodiversity change. Updates to the assessment would be made based on refinement of the Project design and construction information, including the habitat impacted/avoided and construction timetable and development of the **Outline LEMP [A-046].** As the Project is developed, opportunities would be sought to further apply the mitigation hierarchy and to increase the distinctiveness and condition of the habitats created. |
| 4.6.11 | Biodiversity net gain can be delivered onsite or wholly or partially off-site. We encourage details of any off-site delivery of biodiversity net gain to be set out within the application for development consent. | The Project aims to deliver a 10% net gain in biodiversity which requires off site biodiversity units to be purchased. While every effort has been made to deliver the required biodiversity units on-site through replacement planting and on-site mitigation in the form of habitat creation and enhancement, given the scale and nature of the Project, this 10 % net gain is not fully achievable on-site. Off-site biodiversity units are therefore proposed to make up this deficit. |
| 4.6.12 | When delivering biodiversity net gain off-site, developments should do this in a manner that best contributes to the achievement of relevant wider strategic outcomes, for example by increasing habitat connectivity, enhancing other ecosystem service outcomes, or considering use of green infrastructure strategies. Reference should be made to relevant national or local plans and strategies, to inform off-site biodiversity net gain delivery. If published, the relevant strategy is the Local Nature Recovery Strategy (LNRS). If an LNRS has not been published, the relevant consenting body or planning authority may specify alternative plans, policies or strategies to use. | Biodiversity is not bound by Local Authority area and therefore off-site Biodiversity Net Gain (BNG) will be considered across the length of the Project. However as detailed within the **7.1 Biodiversity Net Gain Report [APP-299]**, the aim is to deliver a biodiversity legacy ideally in each of the three Counties crossed by the Project (Norfolk, Suffolk and Essex). Off-site BNG sites will be selected based on a range of factors including proximity to the Project, geographical location, local nature recovery strategies, habitat type, habitat condition, cost and timings amongst others.<br>The Project reviewed and considered the draft LNRSs as outlined in the BNG Report as the final reports had not been published when the report was produced. National |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | Grid will consider projects that align with the LNRSs in the three counties that the Project is located within. It is seeking to purchase units that provide wider societal benefits and deliver Environmental Net Gain. The Project is aware of several nature recovery projects that interact with its alignment and have sought to minimise the potential for negative effects. The Project design allows for future plans for nature recovery so that river restoration projects for example will be able to proceed without adverse effects to the Project or nature.<br>Consultations with third-party stakeholders are on-going to secure off-site compensation to offset the impacts of the Project. |
| 4.6.13 | In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as<br>• reductions in GHG emissions<br>• reduced flood risk<br>• improvements to air ~~or~~, water or soil quality,<br>• climate adaptation,<br>• landscape enhancement<br>• increased access to natural greenspace, and/or<br>• the enhancement, expansion or provision of trees and woodlands<br>The scope of potential gains will be dependent on the type, scale, and location of specific Projects. Applicants should look for a holistic approach to delivering wider environmental gains and benefits through the use of nature-based solutions and Green Infrastructure. | **Chapter 7 of the Planning Statement [APP-085]** includes details on the wider environmental gains which would be delivered by the Project. National Grid has embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project. Embedded measures are those that are intrinsic to and built into the design of the Project, which have been presented in Table 4.2 in **ES Chapter 4: Project Description [APP-130]**.<br>Standard mitigation measures, comprising management activities and techniques, would be implemented during construction of the Project to limit effects through adherence to good site practices and achieving legal compliance.<br>The **Outline CoCP [APP-300]** sets out the required mitigation measures and environmental commitments that will be implemented during the construction phase of the Project. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | Additional mitigation measures have also been proposed over and above any embedded and standard mitigation measures including the **Outline LEMP [AS-046]** has been produced to detail the additional environmental measures that would be implemented to avoid, minimise, mitigate and compensate (ecology only) the landscape and visual and ecological features likely to be impacted during construction and operation (and maintenance). It sets out how the land, vegetation and habitats would be reinstated following construction. It includes details on additional mitigation measures required for ecology during and post-construction, as well as detailing any required management of these receptors post-construction. The **Outline LEMP [AS-046]** is secured by Requirement 4 in the **Draft DCO [APP-056]**.<br>As presented in **ES Appendix 4.1: Greenhouse Gas Assessment [APP-131]** the total CO2e estimated on the Project is 376,214 tCO2e. This is split into 333,4617 tCO2e for capital (construction) carbon (which would be spread over the whole construction duration), 39,199 tCO2e for transmission losses during 40 years of operation and 3,398 tCO2e for Non SF6 loss through leakage.<br>National Grid follows the principles of PAS 2080: 2023 Carbon Management in Infrastructure and Built Environment, throughout the project development process and require this of its contractors. PAS 2080 is a global standard for managing infrastructure carbon. This framework looks at the whole value chain, aiming to reduce carbon and reduce cost through more intelligent design, construction and use. Design optimisation in line with the carbon reduction hierarchy is included below:<br>• Reduce the elements and materials required for the construction phase of the Project |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | • Use alternative raw materials and resources, such as those with a higher proportion of recycled content<br>• Use efficient construction processes, such as manufacture and assembly design. |
| 4.6.15 | Applications for development consent should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains have been considered, and where appropriate, incorporated into proposals as part of good design (including any relevant operational aspects) of the Project. | **ES Chapter 8: Ecology and Biodiversity [AS-026]** and the **Biodiversity Net Gain Report [APP-299]** states that National Grid have committed to delivering at least 10% BNG with wider environmental and societal benefits through a combination of replacement planting, and on-site and off-site mitigation. On-site habitat creation and enhancement will be delivered around permanent assets (i.e. substations and CSE compounds) in the form of mitigation areas labelled 'Environmental Areas' for landscape planting (and BNG). The location of these areas is presented in **ES Figure 4.1: Proposed Project Design [APP-133]**. Off-site BNG locations are not confirmed. As described above, opportunities are being explored with local stakeholders. |
| 4.6.18 | Opportunities for environmental, social, and economic enhancements, protection and mitigation measures are identified in a number of sections in Part 5 of this NPS, which provides guidance on the impacts of new energy infrastructure. | Noted. |
| | **Secretary of State decision making** | |
| 4.6.~~1~~ 19– 4.6.~~3 (Note formatting error in EN-1 text)~~21 | Although achieving biodiversity net gain is not currently an obligation on applicants, Schedule 15 ~~of~~to the Environment Act 2021 contains provisions which, when commenced, mean the Secretary of State may not grant an application for Development Consent Order unless satisfied that a biodiversity gain objective is met in relation to the onshore development in England to which the application relates. | As set out in the **Biodiversity Net Gain Report [APP-299]** the Environment Act 2021 introduces a mandatory requirement for 10% biodiversity net gain (BNG), for new developments consented under the Town and Country Planning Act 1990 (TCPA) to ensure that they enhance biodiversity. It is anticipated that NSIPs, consented through a Development Consent Order (DCO) under the Planning |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | The biodiversity gain objective will be set out in a biodiversity gain statement (as defined under the Environment Act 2021). Normally these statements would be included within an NPS, but the Act allows for the statement to be published separately where a review of an NPS has begun before the provisions are commenced, as is the case with these energy NPSs.<br>Under the provision of the Environment Act 2021, any such separate biodiversity gain statement will be regarded as being contained within these NPSs.<br>The Secretary of State should give appropriate weight to environmental and biodiversity net gain, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited. | Act 2008, would be subject to the BNG requirement from May 2026. The Project is anticipated be submitted in August 2025 and therefore prior to the BNG mandatory requirement for NSIP applications. Despite BNG not yet being a mandatory requirement for NSIPS, National Grid has sought to deliver 10% BNG with wider environmental and societal benefits on all construction projects, including this Project. The **Biodiversity Net Gain Report [APP-299]** presents the initial (application stage) BNG calculation undertaken for the Project using Natural England's Statutory Biodiversity Metric (as of June 2025) in order to demonstrate how BNG could be achieved on the Project. |
| 4.6.15 | Applications for development consent should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains have been considered, and where appropriate, incorporated into proposals as part of good design (including any relevant operational aspects) of the project. | |
| **4.7** | **Criteria for good design for Energy Infrastructure** | |
| 4.7.1 – 4.7.2 | The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object – be it a building or other type of infrastructure – including fitness for purpose and sustainability, is equally important.<br>Applying good design to energy Projects should produce sustainable infrastructure sensitive to place, including | Good design of transmission infrastructure is primarily governed by application of the Holford and Horlock rules within technical limitations to meet safety, security, cost effectiveness and operational requirements.<br>The Project's design, detailed in **ES Chapter 4: Project Description [APP-130]** and informed by alternatives in **ES Chapter 3: Alternatives [APP-127]**, reflects National Grid's duty to be economical, efficient, and safe. **The Design and Access Statement [APP-353]** sets out how the Project adheres to the 'criteria for good design for |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area. | Energy Infrastructure' with reference to the PINS advice guide and the NIC design principles.<br>The importance of process and addressing sustainability are essential elements of good design. The emphasis placed on the importance of process through the Project's evolution and delivering sustainability is set out in within this **Design and Access Statement [APP-353].** |
| 4.7.3 | Good design is also a means by which many policy objectives in the NPSs can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts such as noise. Projects should look to use modern methods of construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, Projects should include the reuse of material. | The **Design Approach for Site Specific Infrastructure (DASSI) [APP-354]** explains the approach to materials.<br>Schedule 3 of the **Draft DCO** (Requirements) controls how the Project is built by securing conditional control relating to design. Requirement 11 ensures that the final appearance of permanent buildings is consistent with the approved design principles in the DASSI as certified under Schedule 18. It provides a mechanism for enforceable design-led detailing post consent, ensuring matters agreed during examination are delivered throughout construction whilst still allowing flexibility for innovation at detailed design stage. |
| 4.7.4 | Given the benefits of good design in mitigating the adverse impacts of a Project, applicants should consider how good design can be applied to a Project during the early stages of the Project lifecycle. | **Section 6 of the Planning Statement [APP-085]** sets out the project evolution and design approach taken from the onset to submission.<br>The **Design and Access Statement [APP-353]** sets out a summary of how good design has been applied to the Project. |
| | **Applicant assessment** | |
| 4.7.5 | To ensure good design is embedded within the Project development, a Project board level design champion could be appointed, and a representative design panel used to maximise the value provided by the infrastructure. Design principles should be established from the outset of the | The **Design and Access Statement [APP-353]** sets out National Grid's design principles which have guided the evolution of the Project. The Design and Access Statement states that, in accordance with the Design Principles for National Infrastructure (National Infrastructure Commission, |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | Project to guide the development from conception to operation. Applicants should consider how their design principles can be applied post-consent. | 2020), National Grid will appoint a design champion to provide independent oversight and advocacy for good design throughout the lifecycle of the project, the design champion will act as a critical friend, ensuring the design principles secured through the DCO are upheld during detailed design development and implementation. There is a section in the **Design and Access Statement [APP-353]** which covers the secure stage post-consent. |
| 4.7.6 | Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, ~~land form~~landform and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area. Applicants should also, so far as is possible, seek to embed opportunities for nature inclusive design within the design process. | The **Design Approach for Site Specific Infrastructure (DASSI) [APP-354]** outlines the design principles, sets out an approach to the design and use of materials for site-specific infrastructure of non-linear works, and details those elements of the design which have some flexibility in their appearance.<br>National Grid have considered the proposed materials and colour palette for the CSE compounds and new substation / substation extension, including buildings to be sensitive to the environment they are located in, where practicable. Further information is included in the **Design Approach for Site-Specific Infrastructure [APP-354].**<br>Schedule 3 of the DCO (Requirements) controls how the Project is built by securing conditional control relating to design. Requirement 11 ensures that the final appearance of permanent buildings is consistent with the approved design principles in the DASSI as certified under Schedule 18. It provides a mechanism for enforceable design-led detailing post consent, ensuring matters agreed during examination are delivered throughout construction whilst still allowing flexibility for innovation at detailed design stage.<br>The Project has sought to embed landscape and visual mitigation in the design in the form of Environmental Areas proposed at the Substations and the CSE compounds as |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | shown on the indicative landscape proposals within **Appendix D of the Outline Landscape and Ecological Management Plan (OLEMP) [APP-325]**. |
| 4.7.7 | Applicants must demonstrate in their application documents how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected. | The design evolution of the Project has been an iterative process and this is set out in **Section 6 of the Planning Statement [APP-085).** National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. The **Design Development Report [APP-122]** provides an explanation of the main changes in the route alignment and technology following the review and consideration of feedback received to the 2024 statutory consultation and to the targeted statutory and non-statutory consultations held in 2025.<br>A **Design and Access Statement [APP-353]** has also been produced that sets out a summary of how National Grid has approached good design and responded to the physical, environmental and socio-economic context of the proposed infrastructure.<br>The Design Development Report and Design and Access Statement should be read alongside **ES Chapter 3: Alternatives [APP-127]**. National Grid has also had regard to the Horlock and Holford rules in respect to the siting of new transmission infrastructure and substations. |
| 4.7.8 | Applicants should consider taking independent professional advice on the design aspects of a proposal. In particular, the Design Council can be asked to provide design review for nationally significant infrastructure Projects and applicants are encouraged to use this service. Applicants should also consider any design guidance developed by the ~~local planning authority.~~LPA. | Given the nature of electricity transmission infrastructure with technical design limitations, regulatory and other operational constraints – the amount of influence on design is therefore limited. An Internal Design Review Note has been prepared by a design specialist and forms Appendix B of the Design and Access Statement **[APP-353]**. Appendix B reviews the rationale and design decisions within this application, demonstrating regard to the Nationally Significant Infrastructure Projects: Advice on Good Design |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | (Planning Inspectorate, 2025) and the NIC design principles. The **Design and Access Statement [APP-353]** and the **Local Plans Policy Compliance Document [APP-086]** have considered the Project against the local plan design guidance where appropriate. |
| | **Secretary of State decision making** | |
| 4.7.10 - 4.7.11 | In the light of the above and given the importance which the Planning Act 2008 places on good design and sustainability, the Secretary of State needs to be satisfied that energy infrastructure developments are sustainable and, having regard to regulatory and other constraints, are as attractive, durable, and adaptable (including taking account of natural hazards such as flooding) as they can be. In the light of the above and given the importance which the Planning Act 2008 places on good design and sustainability, the Secretary of State needs to be satisfied that energy infrastructure developments are sustainable and, having regard to regulatory and other constraints, are as attractive, durable, and adaptable (including taking account of natural hazards such as flooding) as they can be.<br><br>In doing so, the Secretary of State should be satisfied that the applicant has considered both functionality (including fitness for purpose and sustainability) and aesthetics (including its contribution to the quality of the area in which it would be located, any potential amenity benefits, and visual impacts on the landscape or seascape) as far as possible. | See response to 4.7.6 above.<br><br>The **Flood Risk Assessment (FRA) [APP-331]** has been submitted as part of the application for development consent focussing on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources.<br><br>A sequential approach has been taken to siting infrastructure for the Project, particularly those elements that are vulnerable to inundation. The proposed temporary construction compounds and Cable Sealing End (CSE) compounds are located in Flood Zone 1, with one exception concerning a CSE compound site at Little Wenham Grove that is partially situated in Flood Zone 3 in the updated flood mapping dataset. However, this CSE would be situated within the defined Limits of Deviation (LoD) to avoid Flood Zone 3, as secured by commitment W19 within the **Outline Code of Construction Practice (CoCP) [APP-300]**.The remaining structures, including above ground structures such as pylons and below ground structures such as the underground cables are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. |
| 4.7.12 | In considering applications, the Secretary of State should take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security requirements which the design has to satisfy. Many of the | This is noted and the design considerations have taken place within the context of meeting National Grid's duty to be economical and efficient and also within the rigorous health and safety processes that National Grid has in place |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | wider impacts of a development, such as landscape and environmental impacts, will be important factors in the design process. | than govern how it designs and constructs its Projects safely. National Grid is already required to ensure that the Project is designed in accordance with standards set out within or overseen by, amongst others, the Electricity Supply, Quality and Continuity Regulations, British Standards (BS), European Standards, the 'Conseil International des Grands Réseaux Electriques', the International Electrotechnical Commission, and the Electricity Networks Association. In addition, the Project must accord with each of the following: National Grid Design Standards, National Grid Technical Specification, National Grid Transmission Procedures, National Grid Policy Statement (Transmission), National Grid Technical Guidance Notes (Electricity) and National Grid Technical Reports (Electricity).<br><br>In addition to the comments made above, regard has also been had to the Horlock and Holford rules in respect to the siting of new transmission infrastructure and substations and as described in detail in **Chapter 5 of the Planning Statement [APP-085].** Both sets of rules have been deployed by National Grid and have formed an important part of developing the preferred route and design of the Project. For example, the route seeks to avoid siting above ground infrastructure in areas with significant amenity value, the most direct route is preferred to avoid the need for additional angle pylons, siting infrastructure in areas benefiting from existing advantageous vegetation screening is preferred and densely populated urban/residential areas should be avoided, where possible. Essentially the Proposed Alignment has been selected because it performed more strongly overall than any other options, having regard to these factors (amongst others). |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 4.7.13 | The Secretary of State should consider such impacts under the relevant policies in this NPS. Assessment of impacts must be for the stated design life of the scheme rather than a shorter time period. | National Grid has assessed potential impacts of climate change and incorporated adaptation/resilience throughout the lifetime of the Project. National Grid has taken into account the impacts of climate change over the development lifetime. |
| 4.7.14 | The Secretary of State should consider taking independent professional advice on the design aspects of a proposal. In particular, the Design Council can be asked to provide design review for nationally significant infrastructure Projects. | See response to 4.7.8 |
| **4.10** | **Climate Change Adaptation and Resilience** | |
| | **Applicant assessment** | |
| 4.10.5 – 4.10.7 | In certain circumstances, measures implemented to ensure a scheme can adapt to climate change may give rise to additional impacts, for example as a result of protecting against flood risk, there may be consequential impacts on coastal change. In preparing measures to support climate change adaptation applicants should take reasonable steps to maximise the use of nature-based solutions alongside other conventional techniques.<br>Integrated approaches, such as looking across the water cycle, considering coordinated management of water storage, supply, demand, wastewater, and flood risk can provide further benefits to address multiple infrastructure needs, as well as carbon sequestration benefits.<br>In addition to avoiding further GHG emissions when compared with more traditional adaptation approaches, nature-based solutions can also result in biodiversity benefits and net gain, as well as increasing absorption of carbon dioxide from the atmosphere. | Consideration of climate change effects on flood risk over the lifetime of the Project are assessed within the FRA **[APP-331]** which also documents the embedded and good practice measures included to make the Project resilient to climate change.<br>National Grid has assessed potential impacts of climate change and incorporated adaptation/resilience throughout the lifetime of the Project. The Project has been designed to be resilient to climate change by locating the above ground elements of the Project, including the substations, CSE compounds and construction compounds, outside of Flood Zones 2 and 3 as described in the FRA.<br>The CSE compound site at Wenham Grove is partially situated in Flood Zone 3 following the release of updated flood mapping dataset from the Environment Agency in March 2025. This CSE compound would be laid out in accordance with the sequential approach, whereby the most vulnerable components are located in areas at lowest risk of flooding. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | The requirements for compensation of loss of floodplain storage associated with the pylons is addressed in the following sub-section and secured by commitment W17 in the **Outline CoCP [APP-300].** No discernible loss of floodplain storage is associated with the CSE compound, associated above ground infrastructure has a very limited footprint. The remaining structures, including above ground structures such as pylons and below ground structures such as the underground cables are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement.<br>The **Outline CoCP [APP-300]** describes the flood practice measures including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime. |
| 4.10.8 – 4.10.10 | New energy infrastructure will typically need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g. site flooding, limited water availability, storms, heatwave and wildfire threats to infrastructure and operations) and indirect (e.g. access roads or other critical dependencies impacted by flooding, storms, heatwaves or wildfires) impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure.<br>The ES should set out how the proposal will take account of the projected impacts of climate change, using government guidance and industry standard benchmarks such as the Climate Change Allowances for Flood Risk Assessments, Climate Impacts Tool and British Standards | The impact of climate change, including the risk of flooding, have been considered during the optioneering and design evolution process. **ES Chapter 3: Alternatives [APP-127]** and **ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]** sets out how the Project has been designed to avoid area of significant flood risk. With the exception of the Wenham Grove CSE Compound the substations and CSE compounds would be located in Flood Zone 1, see the **FRA [APP-331]** for further details. The remaining structures including above ground structures such as pylons and below ground structures such as the underground cable are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. The Lead Local Flood Authorities did not raise any concerns around the use of |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | for climate change adaptation, in accordance with the EIA Regulations.<br>Applicants should assess the impacts on and from their proposed energy project across a range of climate change scenarios, in line with appropriate expert advice and guidance available at the time. | National Grid's technical standards as part of engagement undertaken to date – see **ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]** which sets out the comments received during engagement.<br>The permanent drainage design at the substations and the CSE compounds would be developed in liaison with the Lead Local Flood Authority (LLFA). **Commitment W08 in the Outline CoCP [APP-300]** sets out that surface water runoff will be managed in accordance with the requirements and standards of the relevant LLFA. Surface water runoff will be captured using sustainable drainage techniques that will be designed to allow for climate change resilience and with consideration of exceedance flow routes. With these measures in place, the Project is considered to be resilient to climate change over the Project design life. |
| 4.10.11 | Applicants should demonstrate that proposals have a high level of climate resilience built-in from the outset and should also demonstrate how proposals can be adapted over their predicted lifetimes to remain resilient to a credible maximum climate change scenario. These results should be considered alongside relevant research which is based on the climate change projections. | The Met Office UK Climate Projections (UKCP24) (Met Office, 2024) provide an assessment of likely climate change trends for the 21st century, with potential changes including wetter winters and drier summers (with higher intensity rainfall), that could affect soil conditions, land grade and farming practices, increase the risk of flooding etc. These factors have been taken into account in the **FRA [APP-331]**. |
| 4.10.12 | Where energy infrastructure has safety critical elements, the applicant should apply a credible maximum climate change scenario. It is appropriate to take a risk-averse approach with elements of infrastructure which are critical to the safety of its operation. | See response to 4.10.9 – 4.10.10 |
| | **Secretary of State decision making** | |
| 4.10.13 | The Secretary of State should be satisfied that applicants for new energy infrastructure have taken into account the potential impacts of climate change using the latest UK | The Met Office UK Climate Projections (UKCP24) (Met Office, 2024) provide an assessment of likely climate change trends for the 21st century, with potential changes |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | Climate Projections and associated research and expert guidance (such as the EA's Climate Change Allowances for Flood Risk Assessments or the Welsh Government's Climate change allowances and flood consequence assessments) available at the time the ES was prepared to ensure they have identified appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure, including any decommissioning period) available at the time the ES was prepared to ensure they have identified appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure, including any decommissioning period . | including wetter winters and drier summers (with higher intensity rainfall), that could affect soil conditions, land grade and farming practices, increase the risk of flooding etc. These factors have been taken into account in the **FRA [APP-331]** and the assessments in the relevant topic chapters of the ES such as **ES Chapter 6: Agriculture and Soils [APP-138].** National Grid has also embedded mitigation measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project. Table 4.2 of **ES Chapter 4: Project Description [APP-130]** identifies the embedded mitigation measures which have been incorporated into the design. |
| 4.10.15 | The Secretary of State should be satisfied that there are not features of the design of new energy infrastructure critical to its operation which may be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections, taking account of the latest credible scientific evidence on, for example, sea level rise (for example by referring to additional maximum credible scenarios – i.e. from the Intergovernmental Panel on Climate Change or EA) and that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime. | National Grid has assessed potential impacts of climate change and incorporated adaptation/resilience throughout the lifetime of the Project. Section 5.3 of the DAS sets out the 'sustainability vision' of the Project and details how the Project has been designed to be resilient to climate change.<br>The Project takes account of the latest Met Office UK Climate Projections (UKCP24) (Met Office, 2024) to provide an assessment of likely climate change trends for the 21st century, with potential changes including wetter winters and drier summers (with higher intensity rainfall), that could affect soil conditions, land grade and farming practices, increase the risk of flooding etc. These factors have been taken into account in the **FRA [APP-331]**.<br>The FRA concludes that during operation (and maintenance) over the Project lifetime, flood risk from fluvial, surface water, tidal and groundwater sources is assessed to be low due to locating key infrastructure in Flood Zone 1 and areas at low risk of flooding from surface |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | and groundwater sources. The residual risk, associated with the pylons in areas of medium to high risk, is assessed as low due to the low vulnerability of this type of infrastructure to inundation.<br>National Grid has also embedded mitigation measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project. Table 4.2 of **ES Chapter 4: Project Description [APP-130]** identifies the embedded mitigation measures which have been incorporated into the design.<br>National Grid has undertaken a GHG assessment in **ES Appendix 4.1: Greenhouse Gas Assessment [APP-131].** The assessment concludes that the construction and operational CO2e numbers are not considered to have a material impact on the ability of the Government to meet its carbon reduction targets and therefore are not significant. |
| 4.10.16 | If any adaptation measures give rise to consequential impacts (for example on flooding, water resources or coastal change) the Secretary of State should consider the impact of the latter in relation to the application as a whole and the impacts guidance set out in Part 5 of this NPS. | Applicant is not aware of any consequential effects from its adaptation measures. |
| 4.10.17 | Any adaptation measures should be based on the latest set of UK Climate Projections, the government's latest UK Climate Change Risk Assessment, when available and in consultation with the EA's Climate Change Allowances for Flood Risk Assessments or the Welsh Government's Climate change allowances and flood consequence assessments. | Adaptation measures are detailed above at 4.10.8 – 4.10.10. The Project is accounting for the latest guidance on climate change (UKCP18). The relevant factors have been factored into the **FRA [APP-331]** and the assessments in the relevant topic chapters of the ES.<br>The **Outline CoCP [APP-300]** describes the flood practice measures including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime. |
| 4.10.19 | Adaptation measures should be required to be implemented at the time of construction where necessary and appropriate to do so. However, where they are necessary to deal with the ~~impact~~more extreme impacts of climate change, including credible maximum climate change scenarios, and that measure would have an adverse effect on other aspects of the project and/or surrounding environment (for example coastal processes), the Secretary of State may consider requiring the applicant to keep the need for the adaptation measure and ensure that the measure could be implemented should the need arise, rather than at the outset of the development (for example increasing height of existing, or requiring new, sea walls). | National Grid has identified a number of good practice measures, which generally comprise measures imposed through legislative requirements or represent standard sector good practices. These include measures to reduce nuisance from construction activities. The good practice measures are set out in the **Outline CoCP [APP-300]**.<br>Structures, such as substations, CSE compounds, pylons and underground cables, are designed to National Grid's technical standards to withstand flooding, wind, storms, extreme temperatures, and earth movement. Consequently, the Project is considered resilient to climate change over its design life. |
| **4.12** | **Pollution Control and Other Environmental Regulatory Regimes** | |
| | **Applicants assessment** | |
| 4.12.7 -4.12.8 | ~~Applicants~~Applicants should understand what non-planning permits / consents the development will require and consider the timings for gaining these permissions alongside the timing for gaining the DCO. They should make early contact with relevant regulators, including EA or NRW and the MMO, to discuss their requirements for Environmental Permits and other consents, such as marine licences. Applicants can access enhanced (paid for) pre-application support before applying for an environmental permit. Enhanced pre-application advice is recommended for complex or significant developments to ensure applications contain the necessary assessments to address the risks associated with the proposed activity. Applicants can also explore options, such as submitting | The **Consents and Licences Required Under Other Legislation [APP-084]** sets out the details of additional consents and licences likely to be required for this Project (including those from the Environment Agency), along with details including the licensing body; the likelihood of the permit/ consent being required; the proposed timing of submission; and the current status. The Consents and Licences Required Under Other Legislation also outlines where acts or parts of acts have been disapplied.<br>'~~draft~~ National Grid made early contact with relevant regulators including the **Marine Management Organisation (MMO). The Consultation Report [APP-066]** details the MMOs comments which concluded that the development is an inland development so would not require |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | their application in stages through this route if the application is complex or uses novel technologies. Early engagement on the permissions required for the development is strongly advised and helps the management of these within the timescale for development. This is particularly advisable in circumstances where applicants have a number of permissions to obtain from the EA for their development.<br>Wherever ~~possible~~appropriate, applicants should submit applications for Environmental Permits and other necessary consents at the same time as applying to the Secretary of State for development consent. | a marine licence, therefore National Grid have not consulted further with the MMO. National Grid has continued to engage with the Environment Agency throughout the design and evolution of the Project, through various consultation exercises and through thematic meetings. All engagement is recorded in the **Draft Statement of Common Ground Environment Agency [APP-103]**. |
| | **Secretary of State decision making** | |
| 4.12.9 | In considering an application for development consent the Secretary of State should focus on whether the development itself is an acceptable use of the land or sea, and the impact of that use, rather than the control of processes, emissions or discharges themselves. | Noted. |
| 4.12.10 | The Secretary of State should work on the assumption that the relevant pollution control regime and other environmental regulatory regimes, including those on land drainage, water abstraction and biodiversity, will be properly applied and enforced by the relevant regulator. The Secretary of State should act to complement but not seek to duplicate ~~them.~~those regulatory regimes, but without prejudice to the Secretary of State's duty to 'secure' compliance with the relevant regulatory requirements. | The Project will be constructed and operated in compliance with all relevant legislation, consents and permits. Table 5.1 of the **Outline CoCP [APP-300]** identifies the anticipated licences, assents, consents and permits required for the Project. Further details can be referred in **Consents and Licences Required Under Other Legislation [APP-084]**. |
| 4.12.~~14~~13 | In considering the impacts of the project, the Secretary of State may wish to consult the regulator on matters relevant to the grant of, or conditions which would otherwise be included in, an environmental permit. The Secretary of | See response to 4.~~2~~12.10. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | State should be satisfied that development consent can be granted taking full account of environmental impacts. | An ES (Volume 6 of DCO application) has been submitted with the application for development consent. The ES takes full account of the environmental impacts.<br>National Grid notes that the Secretary of State may wish to consult the regulator on the grant of, or conditions which would otherwise be included in, an environmental permit. National Grid would direct the Secretary of State to the draft Statements of Common Ground in the first instance. |
| 4.12.~~15~~14 | Working in close cooperation with the EA or NRW and/or the pollution control authority, and other relevant bodies, such as the MMO, the SNCB, Drainage Boards, and water and sewerage undertakers, the Secretary of State should be satisfied, before consenting any potentially polluting developments, that:<br>• the relevant pollution control authority is satisfied that potential releases can be adequately regulated under the pollution control framework<br>• the effects of existing sources of pollution in and around the site are not such that the cumulative effects of pollution when the proposed development is added would make that development unacceptable, particularly in relation to statutory environmental quality limits. | An **Outline CoCP [APP-300]** has been submitted as part of the application for development consent. This sets out the actions and measures that would be implemented to reduce the risk of a pollution incident along with proactive actions that would be taken should any pollution incident occur. Prior to the application, the CoCP was shared with the relevant planning authorities, Natural England and the Environment Agency for comment. The Environment Agency responded with comments on several matters from the Outline CoCP relating to water resources including abstraction and discharge and flood defences – these comments are under discussion. Natural England did not provide any comments on the CoCP. |
| 4.12.~~16~~15 | The Secretary of State should not refuse consent on the basis of pollution impacts unless there is good reason to believe that any relevant necessary operational pollution control permits or licences or other consents will not subsequently be granted. On this basis, it is reasonable for the Secretary of State to consider residual amenity issues only when considering whether the development itself is an acceptable use of the land or sea, and on the impacts of that use. | **ES Chapter 7: Air Quality [APP-147], ES Chapter 9: Contaminated Land, Geology and Hydrogeology [APP-181], ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221] and ES Chapter 14: Noise and Vibration [APP-256]** present the likely significant effects which could give rise to pollution impacts. The Project has been designed applying the mitigation hierarchy, as far as practicable, in order to avoid or reduce adverse effects in accordance with this NPS. An **Outline CoCP [APP-300]** has been submitted as part of the application for |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | development consent. This sets out the actions and measures that would be implemented to reduce the risk of a pollution incident along with proactive actions that would be taken should any pollution incident occur. The measures set out within **7.2 Outline CoCP [APP-300]** will be secured via Requirement 4(a) (Construction Management Plans) of **3.1 Draft DCO [APP-056]** within the final CoCP. |
| **4.13** | **Safety** | |
| | **Applicant assessment** | |
| 4.13.5 | Applicants should consult with the HSE on matters relating to safety. | National Grid has consulted with the HSE. In its response to statutory consultation, the HSE considered matters within its remit.<br>The HSE identified that the draft Order Limits fall into the consultation zones of several Major Accident Hazard Sites (MAHS) and the consultation zones of several notified Major Accident Hazard Pipelines (MAHP). Regard has been had to both hazard areas. |
| **4.14** | **Hazardous Substances** | |
| 4.14.5 | Applicants must consult the ~~(~~HSA~~)~~ and HSE at pre-application stage if the project is likely to need hazardous substances consent. Hazardous substances consents are a part of the planning regime which contributes to public safety | An **Outline CoCP [APP-300]** has been submitted as part of the application for development consent. This sets out the actions and measures that would be implemented to reduce the risk of a pollution incident along with proactive actions that would be taken should any pollution incident occurring including appropriate storage and handling of fuels and other substances hazardous to the environment. The contractor would ensure that any potentially hazardous waste is correctly stored, tested, recorded and disposed of. National Grid continue to engage with HSE with respect to compliance with health and safety legislation. |
| 4.14.6 | HSE sets a consultation distance around every site with hazardous substances consent and notifies the relevant ~~local planning authorities.~~LPAs. The applicant should | The HSE has been consulted throughout the consultation activities on the Project. In its response to consultation in 2023, 2024 and 2025, the HSE identified that the draft |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | therefore consult the ~~local planning authority~~LPA at pre-application stage to identify whether its proposed site is within the consultation distance of any site with hazardous substances consent and, if so, should consult the HSE for its advice on locating the particular development on that site. Where a hazardous substance consent has been deemed to be granted, the developer is required to send the relevant HSA any information required by them for the purposes of a register. | Order Limits fall into the consultation zones of several Major Accident Hazard Sites and the consultation zones of several notified Major Accident Hazard Pipelines.<br>The Project does not oversail any of the specific sites identified by the HSE. National Grid has been and continues to engage with the relevant site operators in order to ensure there are no adverse impacts.<br>National Grid is in consultation with operators of the Major Accident Pipeline and specialists to assess and mitigate permanent and temporary construction impacts.<br>The Project is not subject to the Control of Major Accident Hazards Regulations 2015. |
| **4.15** | **Common Law Nuisance and Statutory Nuisance** | |
| | **Applicant Assessment** | |
| 4.15.5 | At the application stage of an energy NSIP, possible sources of nuisance under section 79(1) of the EPA 1990 and how they may be mitigated or limited should be identified by the applicant so that appropriate requirements can be included in any subsequent order granting development consent (see Section 5.7 on dust, odour, artificial light etc. and Section 5.12 on noise and vibration). | A **Statement of Statutory Nuisance [APP-083]** has been submitted with the application for development consent.<br>The **Outline CoCP [APP-300]** includes good practice measures to avoid or reduce the effects of dust, lighting, noise and vibration. These measures would reduce impacts that could otherwise result in nuisance during construction. The development authorised by the DCO must be undertaken in accordance with the CoCP, pursuant to Requirement 4 of the **Draft DCO [APP-056].** National Grid and their contractor would carry out all work in accordance with the CoCP during the construction of the Project unless otherwise agreed with the relevant planning authority.<br>The **Statement of Statutory Nuisance [APP-083]** assesses possible sources of nuisance under section 79(1) of the EPA 1990. With the good practice measures in place, no breach of Section 79(1) of the EPA 1990 is expected as a result of the Project. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | **Secretary of State decision making** | |
| 4.15.6 | At the application stage of an energy NSIP, possible sources of nuisance under section 79(1) of the EPA 1990 and how they may be mitigated or limited should be considered by the Secretary of State so that appropriate requirements can be included in any subsequent order granting development consent (see Section 5.7 on dust, odour, artificial light etc. and Section 5.12 on noise and vibration). | See response to 4.15.5 |
| 4.15.7 | The Secretary of State should note that the defence of statutory authority is subject to any contrary provision made by the Secretary of State in any particular case in a Development Consent Order (section 158(3) of the Planning Act 2008). Therefore, subject to Section 5.7 and Section 5.12, the Secretary of State can disapply the defence of statutory authority, in whole or in part, in any particular case, but in so doing should have regard to whether any particular nuisance is an inevitable consequence of the development. | Noted. |
| **4.16** | **Security Considerations** | |
| | **Applicant assessment** | |
| 4.16.6 | Where national security implications have been identified, the applicant should consult with relevant security experts from NPSA, ONR (for civil nuclear) and/or DESNZ to ensure security measures have been adequately considered in the design process and that adequate consideration has been given to the management of security risks. | National Grid is a provider of critical infrastructure across the UK. In this role, National Grid maintains regular dialogue with a range of organisations with responsibility for both local and national crime prevention and security. As such, all sites and infrastructure would be designed and operated to the relevant security standards.<br>**ES Chapter 4: Project Description [APP-130]** outlines security measures that have been incorporated into the design to ensure the assets are protected. This includes measures such as lighting, gates and fencing. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| **5** | **Generic Impacts** | |
| **5.1** | **Introduction** | |
| **5.2** | **Air Quality and Emissions** | |
| 5.2.3 | For many air pollutants there is not a threshold below which there is no health impact so it is important that energy infrastructure schemes consider not just how a scheme may impact statutory air quality limits, objectives or targets but also measures to mitigate all emissions in order to minimise human exposure to air pollution, especially for those who are more susceptible to the impacts of poor air quality. | **ES Chapter 7: Air Quality [APP-147]** presents the assessment of the likely significant air quality effects that could result from the Project. During the construction phase, construction machinery and vehicles could generate dust and fine particulate matter, particularly through earthwork and soil stripping activities. Machinery and vehicles would also emit exhaust emissions through the combustion of fossil fuels. There is limited potential for the Project to generate dust and emissions during the operational phase, due to the limited activities associated with inspection and maintenance, therefore, this has been scoped out of the assessment. A construction dust risk assessment has been undertaken and is reported in **ES Appendix 7.3: Air Quality Assessment Results [APP-150]**. |
| 5.2.4 | In addition, a particular effect of air emissions from some energy infrastructure may be eutrophication, which is the excessive enrichment of nutrients in the environment. Eutrophication from air pollution results mainly from emissions of NOx and ammonia. The main emissions from energy infrastructure are from altering the competitive balance of species and thereby damaging biodiversity. In aquatic ecosystems it can cause changes to algal composition and lead to algal blooms, which remove oxygen from the water, adversely affecting plants and fish. The effects on ecosystems can be short term or irreversible and can have a large impact on ecosystem services such as pollination, aesthetic services and water supply. | No eutrophication effects are anticipated as the Project does not result in the increase in new residential accommodation or intensified agricultural uses. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | **Applicant assessment** | |
| 5.2.8 | Where the project is likely to have adverse effects on air quality the applicant should undertake an assessment of the impacts of the proposed project as part of the ES. | An air quality assessment has been undertaken within **ES Chapter 7: Air Quality [APP-147].** |
| 5.2.9 | The ES should describe:<br>• existing air quality concentrations and the relative change in air quality from existing levels;<br>• any significant air quality effects, mitigation action taken and any residual effects, distinguishing between the project stages and taking account of any significant emissions from any road traffic generated by the project;<br>• the predicted absolute emissions, concentration change and absolute concentrations as a result of the proposed project, after mitigation methods have been applied; and<br>• any potential eutrophication impacts. | The air quality assessment presented in **ES Chapter 7: Air Quality [APP-147]** assesses the likely air quality effects that would result from the Project and considers the existing baseline conditions and the likely changes and effects to air quality levels during the construction phase. The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routeing and siting of infrastructure and temporary works. An assessment of construction dust impacts on local amenity and ecological sites is also provided as detailed in **ES Appendix 7.1: Air Quality Assessment Methodology [APP-148] and ES Appendix 7.3: Air Quality Assessment Results [APP-150].**<br>The assessment confirms that with the implementation of the proposed standard mitigation measures, the effects of construction on air quality in regard to dust, traffic emissions and NRMM emission and human health effects are anticipated to be not significant.<br>As set out in the **Scoping Report [APP-288 to APP-296]** and agreed within the **Scoping Opinion [APP-297]**, the operational phase of the Project will not result in any significant impacts to air quality, and no further assessment has been carried out in the ES.<br>The assessments conclude that during construction the effects on air quality from vehicle emissions generated by the Project would be negligible and therefore not |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | significant. These conclusions assume design mitigation and management measures proposed, set out in the **Outline CoCP [APP-300]** are implemented.<br>The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. Measures to control air quality emissions including dust are set out in the **Outline CoCP [APP-300].** The detailed CoCP would come forward post consent as secured by **Requirement 4 in Schedule 3 of the Draft DCO [APP-056].**<br>No eutrophication impacts are anticipated. |
| 5.2.10 | In addition, applicants should consider the Environment Targets (Fine Particulate Matter) (England) Regulations ~~2022~~2023 and associated Defra guidance. | **ES Chapter 7: Air Quality [APP-147]** has considered this guidance. |
| 5.2.11 | Defra publishes future national projections of air quality based on estimates of future levels of emissions, traffic, and vehicle fleet. Projections are updated as the evidence base changes and the applicant should ensure these are current at the point of an application. The applicant's assessment should be consistent with this but may include more detailed modelling and evaluation to demonstrate local and national impacts. If an applicant believes they have robust additional supporting evidence, to the extent they could affect the conclusions of the assessment, they should include this in their representations to the Examining Authority along with the source. | The Defra background air quality mapping projections from the 2021-base year dataset were used in the assessment which were current at the point of application. This is referenced in **ES Chapter 7: Air Quality [APP-147]**. |
| 5.2.12 | Where a proposed development is likely to lead to a breach of any relevant statutory air quality limits, objectives or targets, or affect the ability of a non-compliant area to | There are no significant emissions resulting from the Project that would pose a threat to statutory air quality limits. During the operation of the Project, vehicle numbers |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | achieve compliance within the timescales set out in the most recent relevant air quality plan/strategy at the time of the decision, the applicant should work with the relevant authorities to secure appropriate mitigation measures to ensure that those statutory limits, objectives or targets are not breached. | are expected to be very low, and the only anticipated emissions should be from maintenance vehicles, which is likely to be negligible and sporadic with no quantifiable effect on local air quality. |
| 5.2.13 | The Secretary of State should consider whether mitigation measures are needed both for operational and construction emissions over and above any which may form part of the project application. A construction management plan may help codify mitigation at this stage. In doing so the Secretary of State should have regard to the Air Quality Strategy in England, or the Clean Air Plan for Wales in Wales, or any successors to these and should consider relevant advice within Local Air Quality Management guidance and PM2.5 targets guidance. | An **Outline CoCP [APP-300]** has been submitted as part of the application for development consent. This sets out the actions and measures that would be implemented to reduce the risk of a pollution to air, land, ground and surface water, waste, odour, noise, light and other such amenity.<br>With respect to pollution and environmental amenity, from an air quality perspective, **ES Chapter 7: Air Quality [APP-147]** assesses high, medium and low sensitivity receptors with respect to dust. An assessment is also made of the likely air quality effects that would result from the Project and considers the existing baseline conditions and the likely changes and effects to air quality levels during the construction phase. The assessment confirms that with the implementation of the proposed standard mitigation measures, the effects of construction on air quality in regard to dust soiling, and human health effects are anticipated to be not significant.<br>**ES Chapter 8: Ecology and Biodiversity [AS-026]** notes that it was agreed within EIA Scoping Opinion that the effects from vehicle emissions associated with diverted traffic during construction can be scoped out of the ES, provided it can be demonstrated that the predicted volumes of diverted traffic would not exceed the relevant indicative criteria for air quality assessment set out in the Institute of Air Quality Management (IAQM) guidance. No significant negative effects on habitats because of construction traffic |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
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| | | have been identified in **ES Chapter 7: Air Quality [APP-147]** and so air quality effects to habitats and species associated with construction traffic was scoped out of the ecology and biodiversity assessment. |
| 5.2.14 | The mitigations identified in Section 5.14 on traffic and transport impacts will help mitigate the effects of air emissions from transport. | The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. **ES Chapter 7: Air Quality [APP-147]** assesses the air quality impacts from construction traffic.<br>**ES Chapter 7: Air Quality [APP-147]** states that embedded measures have been included in the design of the Project, such as the alignment and associated Order Limits have been designed to avoid large residential and urban areas and consequently avoids areas of existing poor air quality. In addition, an almost continuous haul road is proposed as part of the design to reduce construction traffic using the local highway network. By diverting construction vehicles away from large residential and urban areas, the haul roads help to reduce localised emissions and associated air quality impacts in these locations.<br>Standard mitigation measures, comprising management activities and techniques would be implemented during construction of the Project to limit effects through adherence to good site practices and achieving legal compliance. The **Outline CoCP [APP-300]** contains relevant good practice measures relating to air quality.<br>The full results for construction traffic data are provided in **ES Appendix 7.3: Air Quality Assessment Results [APP-150].** The assessment concludes that with the inclusion of standard mitigation, above the embedded |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | measures, the residual impacts associated with the construction phase are not significant. |
| | **Secretary of State decision making** | |
| 5.2.15 | Many activities involving air emissions are subject to pollution control. The considerations set out in Section 4.12 on the interface between planning and pollution control therefore apply. The SoS must also consider duties under other environmental targets and have regard to policies set out in the ~~Government's~~government's Environmental Improvement Plan ~~2023~~. | **ES Chapter 7: Air Quality [APP-147]** has considered this guidance. |
| 5.2.16 | The Secretary of State should give air quality considerations substantial weight where a project would lead to a deterioration in air quality. This could for example include where an area breaches any national air quality limits or statutory air quality objectives. However, air quality considerations will also be important where substantial changes in air quality levels are expected, even if this does not lead to any breaches of statutory limits, objectives or targets. | **ES Chapter 7: Air Quality [APP-147]** concludes that there are no significant emissions resulting from the Project that would pose a threat to statutory air quality limits. During the operation of the Project, vehicle numbers are expected to be very low, and the only anticipated emissions should be from maintenance vehicles, which is likely to be negligible and sporadic with no quantifiable effect on local air quality. |
| 5.2.17 | The Secretary of State should give air quality considerations substantial weight where a project is proposed near a sensitive receptor site, such as an education or healthcare facility, residential use or a sensitive or protected habitat. | **ES Chapter 7: Air Quality [APP-147]** has assessed the impact of the Project on any sensitive receptors. Sensitive receptors have been considered following the IAQM guidance (IAQM, 2024) which sets out, within Box 6 of the document, the approach for identifying high, medium and low sensitivity receptors. The construction traffic and generator/ NRMM assessment has treated all sensitive human receptors equally. Sensitivity was determined based on locations that reflect typical human exposure over the relevant averaging periods defined by air quality standards. The assessment concluded that, with the proposed mitigation measures (set out in the **Outline CoCP [APP-300]** in place the annual mean pollutant concentrations for |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | NO2, PM10 and PM2.5 which were predicted at 59 sensitive human receptors all resulted in a predicted negligible magnitude of change, and therefore effects are considered to not be significant.<br>The Project would require the use of generators at construction compounds. Locations where temporary compounds are within 100 m of sensitive human receptors have been reviewed using GIS and the results are provided in Table A7.3.11 in **ES Appendix 7.3: Air Quality Assessment Results [APP-150]** and shown on **ES Figure 7.7: Air Quality Generators [APP-157].** Mitigation measure AQ2 of the **Outline CoCP [APP-300]** states that where generators are located next to sensitive sites consideration will be given to increasing the release height of emissions for sufficient dispersion, and relevant abatement technology. It is considered that effects from emissions from construction equipment and plant are likely to be neutral and not significant. |
| 5.2.18 | Where a project is proposed near to a sensitive receptor site for air quality, if the applicant cannot provide justification for this location, and a suitable mitigation plan, the Secretary of State should refuse consent. | See response to 5.2.17. |
| 5.2.19 | In all cases, the Secretary of State must take account of any relevant statutory air quality limits, objectives and targets. If a project will lead to non-compliance with a statutory limit, objective or target the Secretary of State should refuse consent. | As concluded in Section 7 of **ES Chapter 7: Air Quality [APP-147]** the Project would not lead to non-compliance with a statutory limits, objective or target |
| **5.3** | **Greenhouse Gas Emissions** | |
| 5.3.3 | As discussed in Part 2, energy infrastructure plays a vital role in decarbonisation. ~~While all~~All steps should be taken to reduce and mitigate climate change impacts, including by improving resource and energy efficiency in the | Noted. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | construction, operation, and decommissioning of energy infrastructure where possible. However, it is accepted that there will be some residual emissions from energy infrastructure, particularly during the economy wide transition to net zero, and potentially beyond. | |
| | **Applicant assessment** | |
| 5.3.4 | All proposals for energy infrastructure projects should include a GHG assessment as part of their ES (See Section 4.3). This should include:<br>• A whole life GHG assessment showing construction, operational and decommissioning GHG impacts, including impacts from change of land use.<br>• An explanation of the steps that have been taken to drive down the climate change impacts at each of those stages.<br>• Measurement of embodied GHG impact from the construction stage.<br>• How reduction in energy demand and consumption during operation has been prioritised in comparison with other measures.<br>• How operational emissions have been reduced as much as possible through the application of ~~best available techniques~~BAT for that type of technology.<br>• Calculation of operational energy consumption and associated carbon emissions.<br>• Whether and how any residual GHG emissions will be (voluntarily) offset or removed using a recognised framework.<br>• Where there are residual emissions, the level of emissions and the impact of those on national and international efforts to limit climate change, both alone | National Grid has undertaken a GHG assessment in **ES Appendix 4.1: Greenhouse Gas Assessment [APP-131].** This calculates the CO2 equivalent (CO2e) comprising both CO2 and SF6 for the Project for the construction and operational (and maintenance) phases and compared them against relevant carbon budgets and emissions. The assessment concludes that the construction and operational CO2e numbers are not considered to have a material impact on the ability of the Government to meet its carbon reduction targets and therefore are not significant.<br>SF6 is a gas commonly used in the electricity industry in electrical switchgear to insulate the live electrical parts and to safely switch the flow of electrical current on and off. This switchgear is used throughout the electrical network, including to connect the generation and storage of renewable energy of all types.<br>As outlined in the **Greenhouse Gas Assessment [APP-131]** It is assumed that no SF6 equipment will be used in the Project, in accordance with National Grid policy. SF6 alternatives such as C4 or G3 have a 99% lower global warming potential (GWP) than SF6.<br>Measures to reduce greenhouse gas emissions are set out in **Appendix H of the CoCP: Greenhouse Gas Reduction Strategy [APP-308].** |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | and where relevant in combination with other developments at a regional or national level, or sector level, if sectoral targets are developed. | |
| | **Mitigation** | |
| 5.3.5 | A GHG assessment should be used to drive down GHG emissions at every stage of the proposed development and ensure that emissions are minimised as far as possible for the type of technology, taking into account the overall objectives of ensuring our supply of energy always remains secure, reliable and affordable, as we transition to net zero. | **ES Appendix 4.1: Greenhouse Gas Assessment [APP-131]** describes the use of the Cost Book and Carbon Interface Tool (CIT) at different stages of the Project. The CIT is provided to the contractors tendering for the Project as they are required to provide a more detailed breakdown of materials, assets, equipment and energy that they propose to use in construction of the Project. On tender award, this CIT would become the 'carbon baseline' for the Project and the Great Grid Partnership who will support the delivery of the project (as set out in the **Design and Access Statement [APP-353]**) would be incentivised to demonstrate a reduction in capital carbon over the duration of construction of the Project. The CIT and carbon footprint will be reviewed on a monthly basis and there would be key performance indicators (KPIs) in place to incentivise the Main Works Contractor(s) to reduce the carbon footprint against the initial baseline. |
| 5.3.6 | Applicants should look for opportunities within the proposed development to embed nature-based or technological solutions to mitigate or offset the emissions of construction and decommissioning. | **ES Appendix 4.1: Greenhouse Gas Assessment [APP-131]** describes how the Great Grid Partnership would be incentivised to demonstrate a reduction in capital carbon over the duration of construction of the Project. This is captured via the use of the CIT. The CIT and carbon footprint will be reviewed on a monthly basis and there would be key performance indicators (KPIs) in place to incentivise the Main Works Contractor(s) to reduce the carbon footprint against the initial baseline. |
| 5.3.7 | Steps taken to minimise and offset emissions should be set out in a GHG Reduction Strategy, secured under the | The Climate Change Act 2008 set in law a long-term target to reduce the UK's GHG emissions to 80% below 1990 |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | Development Consent Order. The GHG Reduction Strategy should consider the creation and preservation of carbon stores and sinks including through woodland creation, hedgerow creation and restoration, peatland restoration and through other natural habitats. | levels by 2050 and established the system of UK carbon budgets. In 2019, the UK government furthered the ambition and committed to bring all GHG emissions to net zero by 2050.<br>As presented in **ES Appendix 4.1: Greenhouse Gas Assessment [APP-131]** the total CO2e estimated on the Project is.5376,214 tCO2e. National Grid follows the principles of PAS 2080: 2023 Carbon Management in Infrastructure and Built Environment, throughout the Project development process and require this of its contractors.<br>In 2021, National Grid detailed a commitment to being fully net zero across all new construction projects by 2025/26 as part of the 'Our Net Zero Construction project' (National Grid, 2021). To deliver this, the focus will be on the absolute reduction of impacts associated with the delivery for the Project and this will be measured via the CIT. Residual emissions of all National Grid projects within the portfolio at the end of 2025/26 (and future years) would be aggregated and offsets delivered in line with National Grid's Offsetting policy guidelines. The assessment considered only the GHG related directly to construction and operation (and maintenance) of the Project. The Project would, however, make an important contribution to reducing GHG and reaching the UK government's target of net zero by 2050, by supporting the distribution of greener energy.<br>**ES Appendix 4.1: Greenhouse Gas Assessment [APP-131]**, states that it is assumed that no SF6 equipment will be used in the Project, in accordance with National Grid policy. SF6 alternatives such as C4 or G3 have a 99% lower global warming potential (GWP) than SF6. National Grid has presented its assessment of greenhouse gas and sought to eliminate the use of a potent greenhouse gas (SF6) from the Project. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | **Secretary of State decision making** | |
| 5.3.8 | The Secretary of State must be satisfied that the applicant has as far as possible assessed the GHG emissions of all stages of the development | **ES Appendix 4.1: Greenhouse Gas Assessment [APP-131]** presents the total CO2e estimated on the Project is 5376,214 tCO2e. National Grid follows the principles of PAS 2080: 2023 Carbon Management in Infrastructure and Built Environment, throughout the Project development process and require this of its contractors. The Project would make an important contribution to reducing GHG and reaching the UK government's target of net zero by 2050, by supporting the distribution of greener energy. **Appendix H: Green House Gas Reduction Strategy within the Outline CoCP [APP-308]** sets out the measures to reduce greenhouse gas emissions. Furthermore, as outlined in **ES Appendix 4.1: Greenhouse Gas Assessment [APP-131]**, it is assumed that no SF6 equipment will be used in the Project, in accordance with National Grid policy. SF6 alternatives such as C4 or G3 have a 99% lower global warming potential (GWP) than SF6. National Grid has presented its assessment of greenhouse gas and sought to eliminate the use of a potent greenhouse gas (SF6) from the Project. |
| 5.3.9 | The Secretary of State should be content that the applicant has taken all reasonable steps to reduce the GHG emissions of the construction and decommissioning stage of the development. | |
| 5.3.10 | The Secretary of State should give appropriate weight to Projects that embed nature-based or technological processes to mitigate or offset the emissions of construction and decommissioning within the proposed development. However, in light of the vital role energy infrastructure plays in the process of economy wide decarbonisation, the Secretary of State must accept that there are likely to be some residual emissions from construction and decommissioning of energy infrastructure. | |
| 5.3.11 | Operational GHG emissions are a significant adverse impact from some types of energy infrastructure which cannot be totally avoided (even with full deployment of CCS technology). Given the characteristics of these and other technologies, as noted in Part 3 of this NPS, and the range of non-planning policies that can be used to decarbonise electricity generation, such as the UK ETS (see Section 2.4), government has determined that operational GHG emissions are not reasons to prohibit the consenting of energy projects or to impose more restrictions on them in the planning policy framework than are set out in the energy NPSs (e.g. the CCR requirements). Any carbon assessment will include an assessment of operational GHG emissions, but the policies | |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | set out in Part 2, including the UK ETS, can be applied to these emissions. | |
| **5.4** | **Biodiversity and Geological Conservation** | |
| 5.4.2 | ~~In 5.4.2 ——~~The Environmental Improvement Plan sets out the ~~25 Year Environment Plan, the government set out its~~government's vision ~~for a quarter-of-a-century action~~ to help the natural ~~work~~world regain and retain good health. ~~A commitment to review the~~The plan is reviewed and can be revised every 5 years ~~was~~, as set ~~into law~~out in the Environment Act 2021. The current Environmental Improvement Plan was published in 2023~~, which reinforces the intent of the 25 Year Environment Plan and sets out a plan to deliver on its framework~~ and ~~vision~~is currently being reviewed. The government's policy for biodiversity in England is set out in the Environmental Improvement ~~Plan 2023~~Plan150, the National Pollinator ~~Strategy~~Strategy151 and the UK Marine ~~Strategy~~Strategy152. The aim is to halt overall biodiversity loss in England by 2030 and then reverse loss by 2042, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people. This aim needs to be viewed in the context of the challenge presented by climate change. Healthy, naturally functioning ecosystems and coherent ecological networks will be more resilient and adaptable to climate change effects. Failure to address this challenge will result in significant adverse impact on biodiversity and the ecosystem services it provides. | National Grid considers that the Project is compliant with the Plan insofar as it is relevant to the Project. The Plan sets out ten goals which include the achievement of: clean air; clean and plentiful water; thriving plants and wildlife; reduced risk of harm from environmental hazards like flooding and drought; the more sustainable and efficient use of resources from nature; enhanced beauty, heritage and engagement with the natural environment; mitigation and adaption to climate change; minimisation of waste; management of exposure to chemicals; and enhanced biosecurity. Where relevant to the Project, all these topics are covered in full in the **ES [APP-123 to APP-286].** |
| | **Habitats Regulations** | |
| 5.4.4 and 5.4.5 | The highest level of biodiversity protection is afforded to sites identified through international conventions. The Habitats Regulations set out sites for which an HRA will | In accordance with planning policy, **Habitats Regulations Assessment (HRA) Report [APP-082]** has been prepared. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | assess the implications of a plan or project, including Special Areas of Conservation and Special Protection Areas.<br>As a matter of policy, the following should be given the same protection as sites covered by the Habitats Regulations and an HRA will also be required:<br>• ~~(a)~~ potential Special Protection Areas and possible Special Areas of Conservation; ~~(b)~~<br>• listed or proposed Ramsar sites; and ~~(c)~~<br>• sites identified, or required, as compensatory measures for adverse effects on Special Protection Areas, Special Areas of Conservation, and any of the other sites covered by this paragraph. | The Appropriate Assessment concluded that there would be no significant adverse effects on the integrity of the Stour and Orwell Estuaries SPA and Ramsar Site with regard to hydrology or habitat loss / disturbance on functionally linked land (FLL) associated with the waterbird assemblage, due to sufficient availability of alternative habitat within the 5 km IRZ that would support lapwing and golden plover that would be temporarily displaced by the construction works. No in-combination effects were identified as part of the assessment. As no significant adverse effects on the integrity of a European site (following the implementation of mitigation) has been identified during the Appropriate Assessment, the HRA does not require progression to Stage 3 of the HRA process. It is, therefore, considered that the assessment undertaken by National Grid is in accordance with the requirements of EN-1 in respect to habitats and species regulations. |
| | **Sites of Special Scientific Interest (SSSIs)** | |
| 5.4.7 | Many SSSIs are also designated as sites of international importance and will be protected accordingly. Those that are not, or those features of SSSIs not covered by an international designation, should be given a high degree of protection. Most National Nature Reserves are notified as SSSIs. | **ES Chapter 8: Ecology and Biodiversity [AS-026]** concludes that the Project would not directly affect any SSSIs as there are no SSSIs within the Project's Order Limits. The Project would not have a significant effect on any of the SSSI identified within the Study Area set out by ES Chapter 8. Furthermore, **ES Appendix 17.3: Inter-Project Cumulative Effects Assessment [APP-284]** concludes that no significant cumulative effects are anticipated for biodiversity during construction or operation in combination with other developments. The inter-project cumulative assessment presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** included a 'cut-off date' of 1 April 2025 to confirm the long list of cumulative developments to be assessed. However, |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | since 1 April the Applicant has been undertaking monthly reviews of planning registers and Local Planning Authority websites and will continue to do so during the Examination period, to check whether there are any new relevant developments / allocations. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement, these would be published into Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate). |
| 5.4.8 | Development on land within or outside a SSSI, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits (including need) of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs. | **Chapter 5 of the Planning Statement [APP-085]** sets out how planning policy, as well as the requirements of the Electricity Act and the principles of the Holford and Horlock Rules, have influenced the optioneering and design evolution process; including limiting impacts to SSSI features in the routing and design studies. This is also reported in **ES Chapter 3: Alternatives [APP-127]** which documents the key environmental factors that were considered in the optioneering and design evolution process. **ES Chapter 8: Ecology and Biodiversity [AS-026]** concludes that there are no significant effects on any SSSI as a result of the Project. Furthermore, **ES Appendix 17.4: Inter-Project Cumulative Effects Matrix [APP-284]** concludes that no significant cumulative effects are anticipated for biodiversity during construction or operation in combination with other developments. **ES Chapter 9: Contaminated Land, Geology and Hydrogeology [APP-181]** concludes there are no likely significant effects on SSSI with geological conservation interests. |
| | **Regional and Local Sites** | |
| 5.4.~~12~~13 and 5.4.~~13~~14 | Sites of regional and local biodiversity and geological interest, which include Regionally Important Geological | As noted in **ES Chapter 9: Contaminated Land, Geology and Hydrogeology [APP-181]** there are no Regional or |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | Sites, Local Nature Reserves and Local Wildlife Sites, are areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery. They can also provide wider benefits including public access (where agreed), climate mitigation and helping to tackle air pollution.<br>National planning policy expects plans to identify and map Local Wildlife sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks. | Local Geological Sites affected by the Project. Potential impacts on sites of regional and local biodiversity interest, such as Local Nature Reserves and Local Wildlife Sites, have been assessed in **ES Chapter 8: Ecology and Biodiversity [AS-026].** Through design and embedded measures impacts to these receptors have been avoided and/or mitigated. Where impacts are unavoidable, habitat reinstatement would take place post-construction. No likely significant residual effects in relation to biodiversity receptors during construction or operation are anticipated as a result of the Project. |
| | **Ancient woodland, ancient trees, veteran trees and other irreplaceable habitats** | |
| 5.4.~~14~~15 and 5.4.~~15~~16 | Irreplaceable habitats are habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity.<br>Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Keepers of Time, the government's policy for ancient and native trees and woodlands in England sets out the government's commitment to maintain and enhance the existing area of ancient woodland, maintain and enhance the existing resource of known ancient and veteran trees, excluding natural losses from disease and death, and to increase the percentage of ancient woodland in active. Ancient and veteran trees found outside ancient woodland are also particularly valuable. Other types of irreplaceable habitats include blanket bog, limestone pavement, coastal sand dunes, spartina salt marsh swards, Mediterranean saltmarsh, scrub, and lowland fen. | The Project has been designed in a way which prioritises the retention of vegetation wherever practicable in accordance with good practice measures as outlined within the **Outline CoCP [APP-300]**. Owing to the size of the Project it has not been possible to completely avoid the loss of such natural features. The **Outline LEMP [AS-046]** sets out the principal measures that are required to help avoid, minimise, mitigate and compensate (where relevant) the impacts to vegetation.<br>In relation to Ancient Woodlands, the physical extent of each ancient woodland along the Project has been mapped based on a combination of aerial imagery and based on information obtained from the ground truthing woodland surveys. Table 8.23 in **ES Chapter 8: Ecology and Biodiversity [AS-026]** lists the Ancient Woodlands identified within a 200m of the Project's Order Limits and identifies the proposed mitigation measure/commitment. The location and further information relating to all Ancient Woodlands is presented within **Appendix 8.1: Habitat~~s~~ Report and presented on Figure A8.1.3: Ancient Woodland Locations [AS-028]**. In addition, the Project |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | has considered 11 woodlands to be Ancient Woodland within **ES Chapter 8: Ecology and Biodiversity [AS-026]** due to the Local Wildlife Site citations mentioning these woodlands support ancient woodland features. These woodlands have therefore been included in the impact assessment as Ancient Woodland.<br><br>The Ancient Woodland and Veteran Tree Strategy found that out of the 51 ancient woodlands within 200 m of the Project Order Limits, potential impacts (excavation and non-excavation), (in the absence of mitigation), were identified at 10 ancient woodland parcels (five within ancient woodlands themselves and five within the 15 m buffer root protection zone (RPZ)). Project commitments to standard mitigation measures have completely removed potential impacts to five of these ancient woodland and reduced impacts to a further one ancient woodland.<br><br>The remaining 5 ancient woodlands (and the associated 15 m buffer) is unavoidable as all proposed works relate to the removal, undergrounding or modification of existing third-party infrastructure (11 kV, 33 kV, 132 kV), with the existing assets already located within the associated woodland or root protection zone. A comprehensive explanation of the Project approach to ancient woodland avoidance and minimisation of impact on ancient woodland is detailed in **Appendix B: Ancient Woodland and Veteran Tree Strategy [APP-323].**<br><br>The precise boundary of each affected ancient woodland will be accurately mapped during pre-construction surveys, to ensure an accurate woodland boundary is determined. This updated information will be incorporated into the Final LEMP, with an updated version of this report (Appendix B) as required. Standard mitigation measures are included within the **Outline CoCP [APP-300]**. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | In relation to veteran trees, **Appendix 13.6: Arboricultural Impact Assessment of ES Chapter 13: Landscape and Visual [APP-236]** concludes that a total of 112 trees and four groups have been surveyed within the Project Study Area as veterans. Four individual veteran trees require removal, while 15 veteran trees and two veteran groups require crown management. A full record of the identified veteran trees is included in T**able 7.3 of the Outline LEMP [AS-046].**<br>**Appendix B: Ancient Woodland and Veteran Tree Strategy [APP-323]** details the compensation and mitigation strategies for veteran trees and ancient woodland impacted. The final mitigation measures, remediation works and long-term monitoring are to be agreed at detailed design stage with the Project arboriculturist and the relevant landowners on a case-by-case basis. All management options discussed for veteran trees need to be achievable and therefore will need landowner consent and agreement with National Grid. Protection measures are to be in place prior to the commencement of construction or pre-construction works and require sign off by the Project Arboriculturist.<br>Also see response to Paragraph 5.4.32 in respect to veteran trees. |
| | **Protection and enhancement of habitats and species** | |
| 5.4.~~16~~17 | Many individual species receive statutory protection under a range of legislative provisions. Other species and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales, as well as for their continued benefit for climate mitigation and adaptation and thereby requiring conservation action. | The Project and/ or mitigates maximum long-term significant adverse effects on important ecological features such as protected species and habitats, during the construction and operation (including maintenance) phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | management plan requirements included in **Schedule 3 of the Draft DCO [APP-056].** |
| | **Applicant assessment** | |
| 5.4.~~17~~18 and 5.4.~~18~~19 | Where the development is subject to EIA the applicant should ensure that the ES clearly sets out any effects on internationally, nationally, and locally designated sites of ecological or geological conservation importance (including those outside England and Wales), on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats.<br>The applicant should provide environmental information proportionate to the infrastructure where EIA is not required to help the Secretary of State consider thoroughly the potential effects of a proposed project. | **ES Chapter 8: Ecology and Biodiversity [AS-026]** details the likely significant effects of the Project with respect to biodiversity, including: internationally, nationally and locally designated sites; protected species and habitats; and other species identified as being of principal importance for the conservation of biodiversity. The chapter concludes that no residual significant adverse effects are predicted as a result of the construction and operation of the Project.<br>**ES Chapter 9: Contaminated Land, Geology and Hydrogeology [APP-181]** details the likely significant effects of the Project with respect to geology and hydrogeology. As identified in **ES Chapter 9: Geology and Hydrogeology [APP-181],** there are no statutory designated sites for geological importance and no potential Local Geological Sites or notified Local Geological Sites within the Study Area. |
| 5.4.~~19~~20 to 5.4.~~21~~22 | The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.<br>Applicants should consider wider ecosystem services and benefits of natural capital when designing enhancement measures.<br>As set out in Section 4.7, the design process should embed opportunities for nature inclusive design. Energy infrastructure projects have the potential to deliver significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains (see Section 4.6 on Environmental and Biodiversity Net Gain). | **ES Chapter 8: Ecology and Biodiversity [AS-026] and ES Chapter 9: Contaminated Land, Geology and Hydrogeology [APP-181**] identify how National Grid has considered opportunities to conserve and enhance biodiversity and geological conservation interests. National Grid will deliver biodiversity net gain by at least 10% or greater in environmental value, on this Project. Further details can be found in the **Biodiversity Net Gain Report [APP-299].** |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | The scope of potential gains will be dependent on the type, scale, and location of each Project. | |
| 5.4.~~22~~23 | The design of ~~Energy~~energy NSIP proposals will need to consider the movement of mobile~~ / /~~migratory species such as birds, fish and marine and terrestrial mammals and their potential to interact with infrastructure. As energy infrastructure could occur anywhere within England and Wales, both inland and onshore and offshore, the potential to affect mobile and migratory species across the UK and more widely across Europe (transboundary effects) requires consideration, depending on the location of development. Applicants should consider relevant plan policies in marine plans in England. | The full assessment of the impacts of the Project on ecology and biodiversity, including movement of mobile/ migratory species, and the proposed mitigation measures are detailed in **ES Chapter 8: Ecology and Biodiversity [AS-026]** submitted as part of this DCO application. The **Habitats Regulations Assessment Report [APP-082]** which supports this DCO also considers the movement of mobile/ migratory species. The full list of what has been included within the scope of the assessment or justification as to why it is not included, can be found **ES Appendix 5.2: Scope of the Assessment [APP-137].** The movement of mobile/ migratory species such as birds, fish and marine and terrestrial mammals has been considered in Table 8.23 of **ES Chapter 8 [AS-026]**. Effects on breeding and overwintering birds are assessed in **ES Chapter 8: Ecology and Biodiversity [AS-026]**. This was agreed with Natural England in July 2022, see ID 3.3.15 of the **Draft Statement of Common Ground with Natural England [APP-101].**<br>As set out in Section 8.7 of ES Chapter 8, this includes impacts on habitats in terms of permanent habitat loss, temporary habitat loss, permanent habitat modification/degradation, and fragmentation (fragmentation impacts are typically described in terms of their impacts on species (rather than the habitats themselves).<br>As stated in Section 3.3 and Paragraph 4.1.7 of the **Habitats Regulations Assessment Report [APP-082]** there is evidence of two areas of Functionally Linked Land (FLL) within the Order Limits (in relation to the Stour and Orwell Estuaries SPA and Ramsar) which have been used by significant numbers of roosting lapwing and golden |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | plover (which are part of the waterbird assemblage) which would be temporarily displaced during the installation of the 400 kV underground cabling. Although significant numbers of lapwing and golden plover have been recorded Table 3.2 of the assessment shows the generally low numbers and irregularity of records within the FLL Survey Locations across the survey period. The survey results also indicate that the lapwing and golden plover flocks the FLL are transient, likely using alternative arable habitat available in the surrounding area. The assessment concluded that there are significant areas of 'excellent' 'good' and 'average' alternative habitat in the 5 km IRZ therefore no additional mitigation measures are required for the birds that would be temporarily displaced.<br>The Appropriate Assessment within the **Habitats Regulations Assessment Report [APP-082]** concluded that there would be no significant adverse effects on the integrity of the Stour and Orwell Estuaries SPA and Ramsar Site with regard to hydrology or habitat loss / disturbance on FLL associated with the waterbird assemblage, due to sufficient availability of alternative habitat within the 5 km IRZ that would support lapwing and golden plover that would be temporarily displaced by the construction works. |
| | **Applicant assessment – Habitats Regulations** | |
| 5.4.~~25~~26 | The applicant should seek the advice of the appropriate SNCB and provide the Secretary of State with such information as the Secretary of State may reasonably require, to determine whether an HRA Appropriate Assessment ~~(AA)~~ is required. Applicants can request and agree 'Evidence Plans' with SNCBs, which is a way to record upfront the information the applicant needs to supply with its application, so that the HRA can be | The **HRA Report [APP-082]** has been undertaken and was taken forward to Appropriate Assessment following advice from Natural England. Details on matters agreed with Natural England and matters for further discussion can be found in ID 3.3.14 to ID 3.3.17 (inclusive) of the **Draft Statement of Common Ground with Natural England [APP-101]**. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | efficiently carried out. If an AA is required, the applicant must provide the Secretary of State with such information as may reasonably be required to enable the Secretary of State to conduct the AA. This should include information on any mitigation measures that are proposed to minimise or avoid likely significant effects. | The **HRA Report [APP-082]** presents the HRA undertaken for the Project, which comprises Stage 1: Screening and Stage 2: Appropriate Assessment. It has concluded no likely significant effects.<br>Stage 1 of the HRA process identified the potential for Likely Significant Effects (on its own or in-combination effects with other plans or projects) on three European sites:<br>• Norfolk Valley Fens SAC<br>• Stour and Orwell Estuaries Ramsar Site<br>• Stour and Orwell Estuaries SPA.<br>The potential LSEs relate to construction activities. All operation (and maintenance) LSEs have been screened out.<br>In the absence of mitigation, direct LSEs through changes in hydrology could not be screened out for the Norfolk Valley Fens SAC or the Stour and Orwell Estuaries SPA and Ramsar Site.<br>In the absence of mitigation, indirect LSEs through temporary land loss, fragmentation of habitat, disturbance (through noise, vibration, light and movement), changes in air quality and changes in hydrology could not be screened out at FLL for the waterbird assemblage qualifying feature of the Stour and Orwell Estuaries SPA and Ramsar Site. Two areas of FLL are present within the Order Limits, which have been used by significant numbers of roosting Lapwing and Golden Plover which are part of the waterbird assemblage of the Stour and Orwell Estuaries SPA and Ramsar Site. The Appropriate Assessment concluded there would be no adverse effects on the integrity of the Norfolk Valley Fens SAC and the Stour and Orwell Estuaries SPA and Ramsar Site with regard to hydrology once mitigation |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | measures within the **Outline CoCP [APP-300]**, secured through **Requirement 4 of the Draft DCO [APP-056]** are implemented. This includes direct and indirect (through FLL) effects at the Stour and Orwell Estuaries SPA and Ramsar Site.<br>The Appropriate Assessment concluded there would be no adverse effects on the integrity of the Stour and Orwell Estuaries SPA and Ramsar Site with regard to air quality on FLL associated with the waterbird assemblage qualifying feature. This is primarily due to the FLL consisting of arable habitat which is not considered to be vulnerable to effects air quality effects. Furthermore, the Outline Dust Management Plan, appended to the **Outline CoCP [APP-304],** secured through **Requirement 4 of the Draft DCO [APP-056]** will be adhered to during the works.<br>Following an assessment of other plans and projects at Stage 1 Screening and Stage 2 Appropriate Assessment to determine the potential for an in-combination it was concluded that there would be no effect on the integrity of any European or Ramsar Sites, their qualifying features or their conservation objectives.<br>As no adverse effects on the integrity of a European Site (following the implementation of mitigation) have been identified during the Appropriate Assessment, the HRA does not require progression to Stage 3 (derogation) of the HRA process.<br>It is, therefore, considered that the assessment undertaken by National Grid is in accordance with the requirements of EN-1 in respect to habitats and species regulations. |
| | **Applicant assessment – Ancient woodland, ancient trees, veteran trees and other irreplaceable habitats** | |
| 5.4.~~32~~33 | Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient | **ES Chapter 8: Ecology and Biodiversity [AS-026]** identified that 51 blocks of ancient woodlands fall within |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operational ~~phase~~phases. | 200 m of the Order Limits, of which 1.7 ha falls within the Order Limits. Table 8.23 in **ES Chapter 8: Ecology and Biodiversity [AS-026]** lists the Ancient Woodlands identified within a 200m of the Project's Order Limits and identifies the proposed mitigation measure/commitment. The location and further information relating to all Ancient Woodlands is presented within Appendix 8.1: Habitat~~s~~ Report and presented on **Figure A8.1.3: Ancient Woodland Locations [AS-028]**. In addition, the Project has considered 11 woodlands to be Ancient Woodland within **ES Chapter 8: Ecology and Biodiversity [AS-026]** due to the Local Wildlife Site citations mentioning these woodlands support ancient woodland features. These woodlands have therefore been included in the impact assessment as Ancient Woodland.<br><br>The Project has been designed in a way which prioritises the retention and conservation of significant trees. Owing to the size of the Project it has not been possible to completely avoid the loss of such natural features therefore an Ancient Woodland and Veteran Tree Strategy (**Appendix B to the Outline LEMP [APP-323]**) has been prepared to support the application for development consent.<br><br>The Ancient Woodland and Veteran Tree Strategy found that out of the 51 ancient woodlands within 200 m of the Project Order Limits, potential impacts (excavation and non-excavation), (in the absence of mitigation), were identified at 10 ancient woodland parcels (five within ancient woodlands themselves and five within the 15 m buffer root protection zone (RPZ)). Project commitments to standard mitigation measures have completely removed potential impacts to five of these ancient woodland and reduced impacts to a further one ancient woodland. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | The remaining 5 ancient woodlands (and the associated 15 m buffer) is unavoidable as all proposed works relate to the removal, undergrounding or modification of existing third-party infrastructure (11 kV, 33 kV, 132 kV), with the existing assets already located within the associated woodland or root protection zone. Only four ancient woodlands (Round Wood, Rivenhall Thicks, Writtle-Writtlepark Woods and Clapgate Wood) have excavation works proposed within the 15 m buffer. All impacts are associated with unavoidable mitigation to third-party pre-existing assets required to facilitate the Project.<br><br>A comprehensive explanation of the Project approach to ancient woodland avoidance and minimisation of impact on ancient woodland is detailed in **Appendix B: Ancient Woodland and Veteran Tree Strategy [APP-323]**.<br><br>As stated in the **Outline CoCP [APP-300]** the Project has committed to there being no physical works or breaking ground within 15 m of ancient woodland where at all practicable. Demarcation measures will be used to ensure this 15 m buffer is not breached. These embedded and standard mitigation measures are set out in the Outline LEMP [AS-046] and the Ancient Woodland and Veteran Tree Strategy (**Appendix B to the Outline LEMP [APP-323])**.<br><br>The implementation of the Outline Dust Management Plan set out within the **Outline CoCP [APP-304]** would ensure no negative effects on ancient woodland because of dust.<br><br>As set out in the **Outline CoCP [APP-300]** where sensitive features are to be retained (i.e., veteran, and mature trees, and Ancient Woodland), an appropriate protective area or protection mechanisms will be established using appropriate equipment or fencing and signage and will be inspected, repaired, and replaced as necessary. The |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | protective areas will be shown on the '**Retention and Reinstatement Plans' contained within the Outline LEMP [AS-046]**.<br>With regard to mitigation for veteran trees, **Appendix B: Ancient Woodland and Veteran Tree Strategy of the Outline LEMP [APP-323]**, Table 5.1, outlines the order of priorities when it comes to veteran trees. In the first instance loss of veteran trees is to be avoided. With regard to veteran trees, A**ppendix 13.6: Arboricultural Impact Assessment of ES Chapter 13: Landscape and Visual [APP-236]** concludes that a total of 112 trees and four groups have been surveyed within the Project Study Area as veterans. Four individual veteran trees require removal, while 15 veteran trees and two veteran groups require crown management.<br>Where loss is unavoidable compensation would be achieved in accordance with the proposed compensation options set out in Table 5.1 of **Appendix B: Ancient Woodland and Veteran Tree Strategy of the Outline LEMP [APP-323].**<br>Veteran trees to be retained within proximity of construction compounds will be subject to protection measures to be in place prior to the commencement of construction or pre-construction works in accordance with the measures set out in Table 5.1 of **Appendix B: Ancient Woodland and Veteran Tree Strategy of the Outline LEMP [APP-323].** Specifications for fencing are outlined in Section 7.3 of the **Outline LEMP [AS-046]** and should be in accordance with clause 6.2 of BS 5387:2012. Barriers and / or ground protection will be used to safeguard RPA on site of veteran trees to be retained. A precautionary RPA has been provided around groups of trees with the RPA reflecting the maximum calculated extent. In accordance with clause |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | 6.2.1.1 of BS 5387:2012, all barriers and ground protection will be installed prior to construction at each relevant location and remain in place until construction has ceased. To assess and ensure the effectiveness of the above remediation works, a monitoring programme will be agreed and adopted by the Project. The purpose of this is to assess the results of remediation works and adapt or amend as necessary on a case-by-case basis. Due to the ecological significance of veteran trees, the monitoring programme will cover a minimum of a 30-year period which aligns with Paragraph 10.4.2 of the **Outline LEMP [AS-046].**<br>The final mitigation measures, remediation works and long-term monitoring are to be agreed at detailed design stage with the Project arboriculturist and the relevant landowners on a case-by-case basis. All management options discussed for veteran trees need to be achievable and therefore will need landowner consent and agreement with National Grid. Protection measures are to be in place prior to the commencement of construction or pre-construction works and require sign off by the Project Arboriculturist. |
| | **Applicant assessment – Protection and enhancement of habitats and species** | |
| 5.4.~~33~~34 - 5.4.~~34~~35 | Applicants should consider any reasonable opportunities to maximise the restoration, creation, and enhancement of wider biodiversity, and the protection and restoration of the ability of habitats to store or sequester carbon as set out under Section 4.6.<br>Consideration should be given to improvements to, and impacts on, habitats and species in, around and beyond developments, for wider ecosystem services and natural capital benefits, beyond those under protection and identified as being of principal importance. This may include considerations and opportunities identified through | The **Outline CoCP [APP-300]** sets out the required mitigation measures and environmental commitments that will be implemented during the construction phase of the Project.<br>The Project is also committed to adopting a sustainable approach to development by pro-actively taking measures to ensure that the Project leaves the environment in a better condition than it was before development (including but not limited to using reasonable endeavours to deliver 10% BNG). The Project will seek to provide strategic habitat enhancement and creation, aiming to identify and |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | Local Nature Recovery Strategies, and national goals and targets set through the Environment Act 2021 and the Environmental Improvement Plan ~~2023~~. | implement opportunities to improve habitat quality and connectivity and align with national nature recovery objectives and Projects. Such measures may include specific habitat creation and enhancement measures and additional receptor specific measures such as the creation of habitat piles and installation of bird and bat boxes.<br>Mitigation for the permanent loss of habitat would be delivered through the creation / enhancement of habitat associated with achieving BNG for the Project. Within the Order Limits seven areas of land (defined as Environmental Areas) are proposed around the Project's permanent assets, where there is sufficient space. To ensure the target is reached, any additional creation / enhancement would be delivered outside of the Order Limits, as identified in the **Biodiversity Net Gain Report [APP-299].**<br>Habitats of Principal Importance that would be lost on a temporary basis would be reinstated in line with the habitat reinstatement principles set out in **Chapter 9 of the Outline LEMP [AS-046].** |
| | **Mitigation** | |
| 5.4.~~35~~36 | Applicants should include appropriate avoidance, mitigation, compensation and enhancement measures as an integral part of the proposed development. In particular, the applicant should demonstrate that:<br>• during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works<br>• the timing of construction has been planned to avoid or limit disturbance during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is | Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features as far as reasonably practicable.<br>National Grid has embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project.<br>Embedded measures are those that are intrinsic to and built into the design of the Project, which have been presented in Table 4.2 in **ES Chapter 4: Project** |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | minimised, including as a consequence of transport access arrangements<br>• habitats will, where practicable, be restored after construction works have finished<br>• opportunities will be taken to enhance existing habitats rather than replace them, and where practicable, create new habitats of value within the site landscaping proposals. Where habitat creation is required as mitigation, compensation, or enhancement the location and quality will be of key importance. In this regard habitat creation should be focused on areas where the most ecological and ecosystems benefits can be realised~~.~~; and<br>• mitigations required as a result of legal protection of habitats or species will be complied with. | **Description [APP-130].** Those relevant to Ecology and Biodiversity include:<br>• The Project has committed to deliver at least 10% BNG with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. Further details can be found in the **Biodiversity Net Gain Report [APP-299]**<br>• Sensitive routeing and siting – Avoid and reduce as far as practicable effects on identified biodiversity receptors. Surveys were ongoing throughout the design process with live information fed into the change control process<br>• The design would allow for landscape planting around Norwich Main Substation, CSE compounds, the new EACN Substation, around the new Tilbury North Substation (two options have been devised, one in the event that the Lower Thames Crossing Project is constructed, and the other if it is not)) and around the existing Norwich Main Substation<br>• Mitigation areas for landscape planting (and BNG) around permanent features are labelled 'Environmental Areas' and are presented on ES **Figure 4.1: Proposed Project Design [APP-133] and ES Figure 4.2: Proposed Project Design — Permanent Features [APP-134].** Landscape planting would reduce effects on landscape and visual receptors in the longer term – further details are provided in the **Outline LEMP [AS-046]**<br>• For access roads and haul roads, the Project requires the crossing of multiple ditches, drains and watercourses. Large or sensitive watercourses, for |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | example those designated as a main river, and those with Water Framework Directive (WFD) status, would be crossed by the temporary haul road using temporary clear span bridges<br>• Temporary and permanent sustainable drainage features form part of Project design to ensure that water quality is protected in the watercourses that would receive surface water from the **Project** |
| 5.4.~~36~~37 | Applicants should produce and implement a Biodiversity Management Strategy as part of their development proposals. This could include provision for biodiversity awareness training to employees and contractors so as to avoid unnecessary adverse impacts on biodiversity during the construction and operation stages. | **National Grid has prepared an Outline LEMP [AS-046]** which serves as a biodiversity management strategy. The Outline LEMP sets out the principal measures that are required to help avoid, minimise, mitigate and compensate (ecology only) for the potential ecological and landscape and visual effects of the Project during and post construction, as per the mitigation hierarchy. Chapter 3 of the Outline LEMP includes details on how biodiversity awareness training will be delivered.<br>Standard mitigation measures are included within the **Outline CoCP [APP-300]** and should be read in conjunction with the **Outline LEMP [AS-046].**<br>The **Outline CoCP [APP-300]** is secured by **Requirement 4 in the Draft DCO [APP-056].** |
| 5.4.~~38~~39 | To further minimise any adverse impacts on geodiversity, where appropriate applicants are encouraged to produce and implement a Geodiversity Management Strategy to preserve and enhance access to geological interest features, as part of relevant development proposals. | **ES Chapter 9: Contaminated Land, Geology and Hydrogeology [APP-181]** considers the potential impacts on the geology and hydrogeology during construction and operation of the Project, and whether those impacts are likely to result in significant effects on groundwater, mineral deposits, designated geological sites, surface water (associated with groundwater impacts) and human health. This also sets out the good practice measures that will be undertaken during construction activities to reduce the risk to geology and hydrogeology receptors and support the |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | assessment. An **Outline CoCP [APP-300]** has been submitted as part of the application for development consent. This sets out the actions and measures that would be implemented to reduce the risk of a pollution incident along with proactive actions that would be taken should any pollution incident occur.<br>ES Chapter 9 concludes that the Project's construction phase would result in a negligible effect which would be not significant with regards to contaminated land, minerals and hydrogeology. Likewise, the operational phase would result in no effects to Sites of Geological Importance and negligible effects to mineral sites. Therefore, there is no need to produce or implement a Geodiversity Management Strategy on the basis of no significant effects. |
| | **Secretary of State decision making** | |
| 5.4.~~42~~43 and 5.4.~~43~~44 | As a general principle, and subject to the specific policies below, development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives (as set out in Section 4.3 above). Where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought.<br>If significant harm to biodiversity resulting from a development cannot be avoided (for example through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then the Secretary of State will give significant weight to any residual harm. | The Project has been designed following the mitigation hierarchy. At the routeing and siting stage, the Project design process was informed by the Holford and Horlock Rules to avoid impacts where possible. These established guidelines informed the evaluation criteria and how the mitigation hierarchy was applied during the options selection process.<br>The adopted design approach is set out within **ES Chapter 3: Alternatives [APP-127]** which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the application for development consent.<br>The mitigation hierarchy is a key component of the Environmental Impact Assessment Process. **ES Chapter 5: EIA Approach and Method [APP-135]** describes the mitigation hierarchy as a stepped process that helps |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | development projects to address potentially adverse impacts on the environment.<br>The mitigation hierarchy has been applied throughout development of the Project as part of the iterative EIA process which has informed the routeing and siting process. The Project has been designed to avoid, reduce or mitigate potentially significant adverse residual effects. Key elements of the application of the mitigation hierarchy in respect of the Project include:<br>• Sensitive routeing and siting of the alignment and Order Limits – as far as practicable, effects on identified environmental (including ecology) assets<br>• The **Outline CoCP [APP-300]** provides the preliminary framework for the principles and procedures that the Main Works Contractor(s) must implement to minimise, manage and mitigate the potential environmental impacts of construction works associated with the Project. The Outline CoCP is secured by Requirement 4 in the **Draft DCO [APP-056].**<br>As reported in **ES Chapter 8: Ecology and Biodiversity [AS-026]** the Project does not result in significant harm to biodiversity. |
| 5.4.~~44~~45 | The Secretary of State should consider what appropriate requirements should be attached to any consent and/or in any planning obligations entered into, in order to ensure that any mitigation or biodiversity net gain measures, if offered, are delivered and maintained. Any habitat creation or enhancement delivered including linkages with existing habitats for compensation or biodiversity net gain should generally be maintained for a minimum period of 30 years, or for the lifetime of the project, if longer. | The Project has committed to deliver at least 10% BNG with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the **Biodiversity Net Gain Report [APP-299].** There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure Projects for which development consent is required, although this could change before the application is determined. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | National Grid's commitment to providing 10% BNG will be secured through a unilateral undertaking given under s.106 of the Town and Country Planning Act 1990. While every effort has been made to deliver the required biodiversity units on-site through replacement planting and on-site mitigation in the form of habitat creation and enhancement, given the scale and nature of the Project, this 10 % net gain is not fully achievable on-site. Off-site biodiversity units are therefore proposed to make up this deficit.<br>Biodiversity is not bound by Local Authority area and therefore off-site Biodiversity Net Gain (BNG) will be considered across the length of the Project. However as detailed within the **7.1 Biodiversity Net Gain Report [APP-299]**, the aim is to deliver a biodiversity legacy ideally in each of the three Counties crossed by the Project (Norfolk, Suffolk and Essex). Off-site BNG sites will be selected based on a range of factors including proximity to the Project, geographical location, local nature recovery strategies, habitat type, habitat condition, cost and timings amongst others.<br>Offsite BNG will be delivered through collaboration with partners and purchased from commercially registered providers. National Grid has been engaging in productive discussions with Norfolk, Suffolk and Essex Wildlife Trusts regarding the provision of off-site BNG units for the Project.<br>National Grid has prepared draft Heads of Terms in relation to s106 Unilateral Undertaking. |
| 5.4.~~45~~46 | The Secretary of State will need to take account of what mitigation measures may have been agreed between the applicant and the SNCB and the MMO/NRW (where appropriate). The Secretary of State will also need to consider whether the SNCB or the MMO/NRW has granted | It is anticipated that protected species mitigation licences will be required for bats, great crested newts, otter, water vole, dormouse and badger.<br>Embedded and good practice measures to avoid significant impacts on biodiversity are found in the **Outline CoCP [APP-300]**. Commitment B01 states that The Main Works |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | or refused, or intends to grant or refuse, any relevant licences, including protected species mitigation licences. | Contractor(s) will comply with relevant protected species legislation. The commitments in the Outline CoCP will be secured by **Requirement 4 in the Draft DCO [APP-056]**. Appropriate licences will be obtained where necessary from Natural England for all works affecting protected species as identified in the ES and through pre-construction surveys. Draft licence applications for badger, water vole and dormouse have been submitted to Natural England. The Applicant is working closely with Natural England towards Letters Of No Impediment for these protected species and expecting receipt during the examination phase as is typical of the Development Consent Order process. These draft licence applications include any requirement for monitoring of licensable species and associated mitigation. The above protected species licensing requirements are detailed within the **5.5 Consents and Licences Required Under Other Legislation [APP-084].** All applicable works will be undertaken in accordance with the relevant requirements and conditions set out in those licences. Where certain biodiversity receptors have been identified or where there is potential for them, and effects cannot be avoided during construction, Reasonable Avoidance Measures and/or Precautionary Working Methods may also be developed and implemented under supervision by an ECoW. National Grid intend to obtain a Letter of No Impediment (LONI) from Natural England for the project wide licenses. A Great Crested Newt District License will also be obtained from Natural Grid.<br>Appropriate mitigation measures have been discussed with Natural England. As such, see also the **Draft Statement of Common Ground Natural England [APP-101]** |
| 5.4.~~46~~47 and 5.4.~~47~~48 | Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as | Whilst BNG is not required by the Environment Act 2021 at the present time, the Project will achieve a minimum of |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | part of good design. The Secretary of State should give appropriate weight to environmental and biodiversity enhancements, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited.<br>When considering proposals, the Secretary of State should maximise such reasonable opportunities in and around developments, using requirements or planning obligations where appropriate. This can help towards delivering biodiversity net gain as part of or in addition to the approach set out at Section 4.6. | 10% Biodiversity Net Gain. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the **Biodiversity Net Gain Report [APP-299].**<br>Furthermore, habitat removed during the construction will be reinstated (with the exception of planting restrictions associated with operational requirements as identified within the **Outline LEMP [AS-046].** |
| 5.4.~~48~~49 | In taking decisions, the Secretary of State should ensure that appropriate weight is attached to designated sites of international, national, and local importance; protected species; habitats and other species of principal importance for the conservation of biodiversity; and to biodiversity and geological interests within the wider environment. | **ES Chapter 8: Ecology and Biodiversity [AS-085]** details the likely significant effects of the Project with respect to biodiversity, including: internationally, nationally and locally designated sites; protected species and habitats; and other species identified as being of principal importance for the conservation of biodiversity. The chapter concludes that no residual significant adverse effects are predicted as a result of the construction and operation of the Project. |
| | **Secretary of State decision making – Habitats Regulations** | |
| 5.4.~~49~~51 | The Secretary of State must consider whether the project is likely to have a significant effect on a protected site which is part of the National Site Network (an habitat site), a protected marine site, or on any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans or projects. | The Project avoids and/ or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, during the construction and operation (including maintenance) phases. |
| | **Secretary of State decision making – Sites of Special Scientific Interest (SSSIs)** | |
| 5.4.~~50~~52 | The Secretary of State should use requirements and/or planning obligations to mitigate the harmful aspects of the development and, where possible, to ensure the | An assessment of impacts of the Project during construction and operation (including maintenance) on designated sites including SSSIs is contained in **ES Chapter 8: Ecology and Biodiversity [AS-026].** No |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | conservation and enhancement of the site's biodiversity or geological interest. | significant adverse effects on any of these designations have been identified, taking into account mitigation set out in the **Outline CoCP [APP-300]**. The commitments in the Outline CoCP will be secured by Requirement 4 in the **Draft DCO [APP-056].** |
| | **Secretary of State decision making – Regional and Local Sites** | |
| 5.4.54 | The Secretary of State should give due consideration to regional or local designations. However, given the need for new nationally significant infrastructure, these designations should not be used in themselves to refuse development consent. | An assessment of impacts of the Project during construction and operation (including maintenance) on designated sites including regional and local designations is contained in **ES Chapter 8: Ecology and Biodiversity [AS-026] and ES Chapter 9 Contaminated Land, Geology and Hydrogeology [APP-181].**<br>No significant adverse residual effects on any of these designations have been identified, taking into account mitigation.<br>There are no Regional or Local Geological Sites affected by the Project. |
| | **Secretary of State decision making – Ancient woodland, ancient trees, veteran trees and other irreplaceable habitats** | |
| 5.4.~~53~~55 | The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists. | *Ancient Woodland*<br>The Project has been designed in a way which prioritises the retention and conservation of significant trees. Owing to the size of the Project it has not been possible to completely avoid the loss of such natural features therefore an Ancient Woodland and Veteran Tree Strategy (**Appendix B to the Outline LEMP [APP-323]**) has been prepared to support the application for development consent.<br>The Veteran Tree Strategy (**Appendix B to the Outline LEMP [APP-323]**) notes that 51 blocks of ancient woodlands fall within 200 m of the Order Limits, of which |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | 1.7 ha is falls within the Order Limits. All ancient woodland is set out within Table A8.1.6 of **ES Appendix 8.1: Habitat Report and presented in ES Figure A8.1.3: Ancient Woodland Locations [both within AS-028]**.<br><br>Of the 51 ancient woodlands within 200 m of the Project Order Limits, only four ancient woodlands (Round Wood, Rivenhall Thicks, Writtle-Writtlepark Woods and Clapgate Wood) have excavation works proposed within the 15 m buffer. All impacts are associated with unavoidable mitigation to third-party pre-existing assets required to facilitate the Project.<br><br>A further six woodlands (Miller's Wood, Stonefield Strip LWS, Mann/Parson's Woods, Sheepcotes Wood, Botneyhill LWS and Little Bladen's Wood (LWS) have non-excavation construction work areas located within the 15 m ancient woodland buffer. Additional mitigation measures have been proposed for all ten of the above-mentioned ancient woodland parcels, to ensure no significant long term residual effects on ancient woodland are encountered as a result of the Project.<br><br>Where it is not possible to completely avoid impacts, the Project seeks to minimise impacts through design changes or modifications to working methodology. Standard mitigation measures, comprising management activities and techniques, would be implemented during construction of the Project to limit effects through adherence to good site practices and achieving legal compliance. The **Outline CoCP [APP-300]** contains relevant standard / good practice mitigation measures relating specifically to landscape, ecology and biodiversity along with commitments made by National Grid.<br><br>As stated in the **Outline CoCP [APP-300]** the Project has committed to there being no physical works or breaking |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | ground within 15 m of ancient woodland where at all practicable. Demarcation measures will be used to ensure this 15 m buffer is not breached. These embedded and standard mitigation measures are set out in the Outline LEMP [AS-046] and the Ancient Woodland and Veteran Tree Strategy (**Appendix B to the Outline LEMP [APP-323]**).<br><br>In addition, the implementation of the Outline Dust Management Plan set out within the **Outline CoCP [APP-304]** would ensure no negative effects on ancient woodland because of dust.<br><br>In most cases, the above avoidance, embedded and standard mitigation measures are adequate to avoid impacts on to ancient woodland. However, where this is not the case, additional mitigation, comprising measures over and above any embedded and standard mitigation measures, are proposed to further reduce avoid significant environmental effects.<br><br>As set out in the **Outline CoCP [APP-300]** where sensitive features are to be retained (i.e., veteran, and mature trees, and Ancient Woodland), an appropriate protective area or protection mechanisms will be established using appropriate equipment or fencing and signage and will be inspected, repaired, and replaced as necessary.<br><br>*Veteran Trees*<br><br>The **Arboricultural Impact Assessment [APP-236]** concludes that a total of 112 trees and four groups have been surveyed within the Project Study Area as veterans. Four individual veteran trees require removal, while 15 veteran trees and two veteran groups require crown management. A full record of the identified veteran trees is included in Table 7.3 of the **Outline LEMP [AS-046].** |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | **Appendix B: Veteran Tree and Ancient Woodland and Veteran Tree Strategy Mitigation Strategy of the Outline LEMP [APP-323]** details the management outcomes and compensation strategy for veteran trees. Veteran trees to be removed will still provide essential habitats for the local flora and fauna. Where practical, after being felled, each tree should be laid as close to their original location as possible or near existing woodland to provide a deadwood habitat area. The material to be left should be as intact as is practicable. |
| | **Secretary of State decision making – Protection and enhancement of habitats and species** | |
| 5.4.~~54~~56 | The Secretary of State should ensure that species and habitats identified as being of importance for the conservation of biodiversity are protected from the adverse effects of development by using requirements, planning obligations, or licence conditions where appropriate. | **ES Chapter 8: Ecology and Biodiversity [AS-026]** details the likely significant effects of the Project with respect to biodiversity, including: internationally, nationally and locally designated sites; protected species and habitats; and other species identified as being of principal importance for the conservation of biodiversity. The chapter concludes that no residual significant adverse effects are predicted as a result of the construction and operation of the Project.<br>Commitment B01 of the **Outline CoCP [APP-300]** states that The Main Works Contractor(s) will comply with relevant protected species legislation. The commitments in the Outline CoCP will be secured by Requirement 4 in the **Draft DCO [APP-056]**. Appropriate licences will be obtained where necessary from Natural England for all works affecting protected species as identified in the ES and through pre-construction surveys, these include project wide licenses for; bats, dormouse, otter, badgers and water vole. All applicable works will be undertaken in accordance with the relevant requirements and conditions set out in those licences. Where certain biodiversity receptors have been identified or where there is potential for them, and effects cannot be avoided during construction, Reasonable |
| 5.4.~~55~~57 | The Secretary of State should refuse consent where harm to a protected species and relevant habitat would result, unless there is an overriding public interest and the other relevant legal tests are met. In this context the Secretary of State should give substantial weight to any such harm to the detriment of biodiversity features of national or regional importance or the climate resilience and the capacity of habitats to store carbon, which it considers may result from a proposed development. | |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | Avoidance Measures and/or Precautionary Working Methods may also be developed and implemented under supervision by an ECoW. National Grid intend to obtain a Letter of No Impediment (LONI) from Natural England for the project wide licenses. A Great Crested Newt District License will also be obtained from Natural Grid.<br><br>To support the Secretary of State within its duties under the Conservation of Habitats and Species Regulations 2017 (as amended) and in accordance with planning policy, **Habitats Regulations Assessment Report [APP-082]** presents the HRA undertaken for the Project, which comprises Stage 1: Screening and Stage 2: Appropriate Assessment. It builds on the Draft HRA Screening Report has concluded that there will be not significant adverse effects of the integrity of a European Site (following the implementation of mitigation).<br><br>The Appropriate Assessment concluded there would be no significant adverse effects on the integrity of the Norfolk Valley Fens SAC and the Stour and Orwell Estuaries SPA and Ramsar Site with regard to hydrology once mitigation measures identified in the **Outline CoCP [APP-300]** are employed secured through Requirement 4 of the **Draft DCO [APP-056]** are implemented. This includes direct and indirect (through FLL) effects at the Stour and Orwell Estuaries SPA and Ramsar Site. |
| **5.5** | **Civil and Military Aviation and Defence Interests** | |
| 5.5.~~37~~38 | Where the proposed development may affect the performance of civil or military aviation CNS, meteorological radars and/or other defence assets an assessment of potential effects should be set out in the ES (see Section 4.3). | Consultation with National Air Traffic Services (NATS) Air Traffic Control (ATC) Safeguarding has confirmed that civil aviation CNS is not impacted by the Project. The Met Office has confirmed that meteorological radars are not significantly impacted by the Project. This is reported in **ES Chapter 15: Socio-economics, Recreation and Tourism Appendix 15.2: Summary of Aviation Impact [APP-267]** |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | which provides a summary of the potential impacts of the Project on aviation in accordance with national policy requirements and also sets out National Grid's consultation efforts with aviation stakeholders.<br>Details of engagement with the MOD and DIO is reported in **Summary of Aviation Impact [APP-267]** and the **Planning Statement [APP-085].** |
| 5.3.~~39~~40 | The applicant should consult the MOD, Met Office, Civil Aviation Authority (CAA), NATS and any aerodrome – licensed or otherwise – likely to be affected by the proposed development in preparing an assessment of the proposal on aviation, meteorological or other defence interests. | As set out in **Appendix 15.2: Summary of Aviation Impact [APP-267]** National Grid has consulted the MOD, Met Office, CAA and NATS as well as owners and operators of aerodromes likely to be affected by the Project. This has included 17 unlicensed civil aerodromes, a military aerodrome and a model aircraft aerodrome identified as located within 5 km of the Project Alignment and assessed to be potentially affected by the proposed development as result of their proximity to Project infrastructure. Consultation has also been undertaken with a licensed civil aerodrome which, whilst located beyond 5 km of the Project Alignment, has a defined safeguarding area infringed by the Alignment. |
| 5.5.~~40~~41 | Any assessment of effects on aviation, meteorological or other defence interests should include potential impacts of the ~~Project~~project upon the operation of CNS infrastructure, Instrument Flight Procedures, flight patterns (both civil and military), generation of weather warnings and forecasts, other defence assets (including radar) and aerodrome operational procedures. It should also assess the demonstratable cumulative effects of the ~~Project~~project with other relevant projects in relation to aviation, meteorological and defence. | National Grid appointed an independent aviation consultancy to assist with consideration of potential interactions with flying activities. Aviation interests identified have included a variety of aircraft types, gliders, hot air ballooning, military, civilian and emergency services helicopters, as well as model aircraft.<br>**National Grid's Aviation Impact Assessments Appendix 15.2: Summary of Aviation Impact [APP-267]** have enabled risk-based site-specific impact assessments for civil aerodromes potentially impacted by the Project. Their primary function is to evaluate risks of collision, predominantly during take-off and approaches and including forced landing risks, with the proposed overhead |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | line alignment representing a new obstacle within proximity of aerodromes. Operational and safety impacts arising from potential increases to risks of bird strike, wind turbulence and electromagnetic forces as a result of the Project are also considered.<br><br>The methodology enables a bespoke appraisal, appropriate to each aerodrome, that considers a range of factors in addition to the height and location of the proposed overhead line alignment, including: runway length and orientation in relation to the overhead line; aircraft types, performance, flight paths and operational procedures (determined from published information, as well as via consultation with operators and relevant aviation stakeholders); and the surrounding context in terms of topography, existing obstacles (including other overhead lines, considering cumulative effects) and neighbouring aerodromes.<br><br>The assessments include consideration of whether the Project alignment infringes Obstacle Limitation Surfaces (OLS) as specified under the CAA's CAP 168 regulations for licensed aerodromes, recognising this to be a best practice measure for obstacle assessment and treatment, albeit not a regulatory requirement for unlicensed aerodromes. If CAP168 measures are met, the proposed overhead line alignment is considered to have an acceptable impact on the aerodrome's operations and no further design changes are considered likely to be necessary. National Grid recognises, however, that aerodrome operators, with responsibility for safeguarding, will review the possibility of agreeing reasonable changes to operational procedures.<br><br>The work to consider the impact on aviation identify Chase Farm Aerodrome as the only site significantly impacted by |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | the Project. Here, the Project may preclude the use of the airfield. The Project has been realigned to lessen impact, and it is not possible due to constraints to re-align it any further.<br>National Grid is collaborating with the MOD to inform the Stakeholder's own assessment of the potential effects of the Project on military aviation, technical assets and other defence interests.<br>National Grid has consulted NATS who have undertaken their own assessment and confirmed that civil aviation CNS is not impacted by the Project. This is evidenced in **ES Chapter 15: Socio-economics, Recreation and Tourism Appendix 15.2: Summary of Aviation Impact [APP-267].**<br>National Grid has consulted the Met Office who have undertaken their own assessment and confirmed that weather-related radar will not be significantly impacted by the Project. |
| 5.5.~~41~~42 | In addition, consideration of developments near aerodromes should take into account the following factors:<br>• Bird Strike Risk - Aircraft are vulnerable to wildlife strike, in particular bird strike. Birds and other wildlife may be attracted to the vicinity of an aerodrome by various types of development, for example, large buildings with perching/roosting opportunities for birds. It is therefore important that infrastructure, buildings and other elements from energy installations, as well as environmental mitigation are designed in such a way so as not to increase the bird strike risk to the airport for developments within 13km (this can vary).<br>• Building Induced Turbulence - If a significant building or structure is proposed close to the airport/runways, there is potential for building induced turbulence/wind shear | As described at 5.5.4~~1~~0, **National Grid's Aviation Impact Assessments Appendix 15.2: Summary of Aviation Impact [APP-267]** take into account factors including bird strike risk and building induced turbulence. Thermal Plume Turbulence is not considered to be a relevant factor to the Project. **ES Chapter 15: Socio-economics, Recreation and Tourism Appendix 15.2: Summary of Aviation Impact [APP-267]** details National Grid's engagement efforts with local gliding groups who may be impacted by the Project. Out of the glider stakeholders consulted only Tibenham Aerodrome raised concerns around operational impacts. National Grid has sought to engage further with Tibenham Aerodrome to minimise operational impacts.<br>In relation to bird strike risk, **Appendix 15.2: Summary of Aviation Impact [APP-267]** considers that the bird species |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | to be created which has the potential to impact on aircraft on take-off and landing. Studies may be required to identify the extent of any turbulence resulting from the energy infrastructure.<br>• Thermal Plume Turbulence - This is caused under certain conditions by the release of hot air from a power plant equipped with a dry cooling system. The plumes generated by these facilities have the potential to create invisible turbulence that can affect the manoeuvrability of aircraft. | of greatest risk are larger wetland species such swans, geese, ducks and waders.<br>The Project overhead line alignment is not assessed likely to attract greater numbers of these species as they are not species that will roost or nest on the lines or pylons. Furthermore, wetland creation is not proposed within the Project. No significant change in the current baseline numbers of these species is expected as a result.<br>Bird species such as pigeons, corvids, starlings (and other passerines / near-passerines) will roost on the lines, sometimes in large flocks. It is assessed that the OHL will not draw these birds in from a wider area, rather provide an alternative roost site. Therefore, no change in the current baseline numbers of these birds is expected.<br>It is recognised that occasional bird of prey could nest on pylons, and so the proposed pylons may attract these birds to the area as they provide a nesting opportunity that would otherwise be absent. However, nesting raptors have fairly big territories and so large numbers of birds won't be attracted, just the occasional breeding pair. The likelihood of an aircraft bird strike as a result of the Project overhead line alignment is assessed to be very low, for the reasons given. Mitigation of residual risk is achievable for aerodrome operators who have residual concerns.<br>It is not assessed that the Project overhead line alignment will increase the risk of wind turbulence for aircraft on approach or departure from any of the potentially affected aerodromes. Buildings at or near airfields can, in certain circumstances, produce wind turbulence which can impact on flight operations, particularly for smaller aircraft types. At the airfields assessed, however, the overhead line would be at a sufficient distance from the flight paths and the structural nature and surfaces of the overhead line |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | infrastructure including pylons are such that wind vortices would not be generated that could impose a threat to aircraft safety. |
| 5.4.~~42~~44 | If any relevant changes are made to proposals during the pre-application and determination period, it is the responsibility of the applicant to ensure that the relevant aviation, meteorological and defence consultees are informed as soon as reasonably possible. | To date, during the pre-application period, National Grid has informed relevant stakeholders of changes to the Project proposals via engagement within and in addition to the non-statutory and statutory consultation periods. National Grid considers its engagement to have been timely whilst allowing feedback and proposed changes from stakeholders to be appropriately considered. |
| | **Mitigation** | |
| 5.5.~~43~~45 | The applicant should include appropriate mitigation measures as an integral part of the proposed development. | National Grid's integrated Project development process has ensured feedback from aviation stakeholders as well as from the conclusions of Aviation Impact Assessments have informed development of the Project design to mitigate risk to aviation safety and operations. This has involved the consideration of design changes such as potential amendments to the location and scale (height) of Project infrastructure to reduce impacts associated with its proximity to aerodromes. The process has resulted in the implementation of changes to both the orientation and location of the Project overhead line alignment in several instances to minimise risks. |
| 5.5.~~44~~46 | Mitigation for infringement of OLS may include:<br>• ~~agreed~~Agreed changes to operational procedures of the aerodromes in accordance with relevant guidance, provided that safety assurances can be provided by the operator that are acceptable to the CAA where the changes are proposed to a civilian aerodrome ~~(and provided that it does not result in an unreasonable reduction of capacity or unreasonable constraints on the operation of the aerodrome against pre-COVID-19~~ | As described at 5.5.4~~0~~, National Grid's Aviation Impact Assessments assess the extent to which OLSs are infringed, amongst other factors. Where minor infringements are assessed to be likely to occur, consultation with aviation stakeholders has involved consideration of reasonable changes to aerodrome operational procedures as well as other mitigation measures, including the future publication of Project infrastructure information for aviation charting purposes. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | ~~levels);~~. Applicants should engage airport operators at an early stage of the planning process to understand the potential impacts of development on aviation operations and develop mitigations if appropriate; or<br>• ~~installation~~Installation of obstacle lighting and/or by notification in Aeronautical Information Service publications | Measures such as marker balls and obstacle lighting are recognised within assessments but are not recommended as appropriate mitigations for any of the aerodromes in scope. National Grid continues to engage with aerodrome owners and operators to agree acceptable operational changes, recognising for the General Aviation civilian aerodromes potentially affected by the Project responsibilities for safeguarding lie with the operator (as stated in Paragraph. 5.5.16). SoCGs have been prepared with the following:<br>• **Barnards Farm Airfield SoCG [APP-109]**<br>• **Brook Farm Airfield SoCG [APP-119]**<br>• **Thurrock Airfield SoCG [APP-110]**<br>• National Grid is developing Statements of Common Ground with both the DIO and WFS, which it intends to submit during Examination. |
| 5.5.~~45~~47 | For CNS infrastructure, the UK military Low Flying system (including TTAs) and designated air traffic routes, mitigation may also include:<br>• ~~operational~~Operational airspace changes~~-~~;<br>• ~~agreement~~Agreement to upgrade CNS infrastructure, the cost of which the applicant ~~may reasonably~~will be required to ~~contribute in part or in full~~fund until the end of the life of the surveillance equipment ~~if subsequently~~unless or until such time as the affected CNS infrastructure may be replaced by a fully windfarm tolerant system. If an appropriate system upgrade cannot be identified at the point of application, the applicant ~~may~~will be required to ~~contribute in part or in full to~~fund any future upgrade for the lifetime of the wind farm. ~~Costs should be~~MOD will engage early with developers to ensure that costs are reflective of their | As per 5.5.3~~7~~8, consultation with the MOD DIO is ongoing. This is inclusive of the assessment of potential Project impacts on the UK military Low Flying system and well as technical assets, and the implementation of associated mitigations. National Grid is developing Statements of Common Ground with both the DIO and WFS, which it intends to submit during Examination. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | need and ~~impact~~impacts of the energy installation on the monitoring equipment;<br>• ~~introducing~~Introducing commercially viable radar mitigation technology to the development, e.g. by using non-radar reflecting materials to manufacture wind turbine blades | |
| 5.5.~~46~~48 | Mitigation for effects on meteorological radar and CNS systems may include reducing the scale of a ~~Project~~project, although it is likely to be unreasonable for the Secretary of State to require mitigation by way of a reduction or alteration in the scale of development. | See 5.5.4~~7~~5 above in relation to military technical assets.<br>Consultation with the Met Office identified that the Project would infringe the safeguarding zone of a meteorological radar (under construction). Subsequent engagement has confirmed that the Project will not significantly impact the radar, and that design modifications to reduce the scale of the Project are not required. |
| | **Secretary of State decision making** | |
| 5.5.~~49~~51 | The Secretary of State should be satisfied that the effects on meteorological radars, civil and military aerodromes, aviation technical sites and other defence assets or operations have been addressed by the applicant and that any necessary assessment of the proposal on aviation, NSWWS or defence interests has been carried out. | National Grid's approach has addressed the potential effects of the Project through consultation with relevant stakeholders, its direct assessment of civil aviation impacts relating to aerodromes, its support to the MOD's assessment of military aviation and defence asset impacts as well as Met Office's assessment of impacts to meteorological radar. Feedback from stakeholders and the conclusions of impact assessments has informed the development of the Project design to minimise adverse impacts, as appropriate.<br>As per 5.5.3~~7~~8, consultation with NATS has confirmed that civil aviation CNS is not impacted by the Project. |
| 5.5.~~50~~52 | In particular, the Secretary of State should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes and that realistically achievable mitigation is carried out on existing surveillance systems such as | As described at 5.5.45~~43~~, National Grid's design development approach has enabled evolution of the Project design to minimise adverse impacts for civil aviation aerodromes within scope, where possible. Engagement with aerodrome operators is ongoing to seek confirmation |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | radar/tracking technologies. It is incumbent on Operators of aerodromes to regularly review the possibility of agreeing to make reasonable changes to operational procedures. | of the acceptability of the Project Alignment via Statements of Common Ground (SOCG) and Stakeholder Agreements, where considered necessary. SoCGs have been prepared with the following:<br>• **Barnards Farm Airfield SoCG [APP-109]**<br>• **Brook Farm Airfield SoCG [APP-119]**<br>• **Thurrock Airfield SoCG [APP-110]**<br>In addition, the SOCG process enables collaborative review and agreement of possible changes to operational procedures by Operators, where considered to be reasonable. Stakeholder Agreements capture where General Aviation operators consider that the Project design and any associated or alternative mitigations (including reasonable changes to operational procedures) do not reduce residual safety or operational risks to an acceptable level from their safeguarding perspective.<br>In relation to military aerodromes, National Grid is developing Statements of Common Ground with both the DIO and WFS, which it intends to submit during Examination.<br>In relation to meteorological radar, the Met Office has confirmed that potential impacts will be small, resulting in some loss of rainfall signal data, but that this impact was assessed to be manageable. |
| 5.5.~~51~~53 | When assessing the necessity, acceptability, and reasonableness of operational changes to aerodromes, the Secretary of State should be satisfied that they have the necessary information regarding the operational procedures along with any demonstrable risks or harm of such changes, taking into account the cases put forward by all parties. When making such a judgement in the case of | As described at 5.5.4039, National Grid's Aviation Impact Assessments for civil aerodromes follow a methodology that considers multiple factors, including site-specific operational information such as aircraft types, performance, flight paths and operational procedures determined from published information, as well as via consultation with Operators and relevant aviation stakeholders. The |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | military aerodromes, the Secretary of State should have regard to interests of defence and national security. | Assessment conclusions focus on safety and operation risks.<br>National Grid recognises the need to work collaboratively with the MOD in the undertaking of impact assessments for military aerodromes, responding to limitations to the sharing and publication of information relating to military assets, in the interests of defence and national security. |
| 5.5.~~58~~60 | Where a proposed energy infrastructure development would significantly impede or compromise the safe and effective use of civil or military aviation, meteorological radars, defence assets and/or significantly limit military training, the Secretary of State may consider the use of 'Grampian conditions', or other forms of requirement which relate to the use of current or future technological solutions, to mitigate impacts on legacy CNS equipment. | As per 5.5.47~~5~~, National Grid recognises the potential requirement for use of a Grampian condition, or similar, to ensure mitigation of potential impacts on the UK military Low Flying system. |
| 5.5.~~59~~62 | Where, after reasonable mitigation, operational changes, obligations and requirements have been proposed, the Secretary of State should consider whether:<br>• a development would prevent a licensed aerodrome from maintaining its licence and the operational loss of the said aerodrome would have impacts on national security and defence, or result in substantial local/national economic loss, or emergency service needs<br>• it would cause harm to aerodromes' training or emergency service needs<br>• the development would impede or compromise the safe and effective use of defence assets or unacceptably limit military training<br>• the development would have a negative impact on the safe and efficient provision of en-route air traffic control | National Grid does not assess that the Project will impact licensed aerodromes, nor cause harm to civil aerodromes' training or emergency services' needs, nor have a negative impact on civil aviation air traffic control services.<br>As described at 5.5.38~~7~~ and 5.5.41~~0~~ the potential for the Project to impede or compromise the safe and effective use of defence assets or unacceptably limit military training is subject to ongoing assessment by the MOD. It is anticipated that risk can be minimised by reasonable mitigation and/or appropriate obligations or requirements.<br>As per 5.5.5~~0~~2, the Met Office does not consider that the Project would compromise the effective provision of weather warnings by the NSWWS. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | services for civil aviation, in particular through an adverse effect on CNS infrastructure<br>• the development would compromise the effective provision of weather warnings by the NSWWS, or flood warnings by the UK's flood agencies | |
| **5.7.** | **Dust, Odour, Artificial Light, Smoke, Steam, and Insect Infestation** | |
| 5.7.1 | During the construction, operation and decommissioning of energy infrastructure there is potential for the release of a range of emissions such as odour, dust, steam, smoke, artificial light and infestation of insects. All have the potential to have a detrimental impact on amenity or cause a common law nuisance or statutory nuisance under Part III, Environmental Protection Act 1990. However, they are not regulated by the environmental permitting regime, so mitigation of these impacts will need to be included in the Development Consent Order. | The **Statement of Statutory Nuisance [APP-083]** identifies the matters set out in Section 79(1) of the EPA 1990 in respect of statutory nuisance and considers whether the Project has the potential to cause nuisance. The Statement of Statutory Nuisance concludes that with the good practice measures in place, that there are no likely nuisances, including dust, odour, artificial light, smoke or insect infestation, anticipated on the Project.<br>The scope of assessment for insect infestation and emissions of odour, dust, steam, smoke and artificial light; National Grid published the **EIA Scoping Report [APP-288 to APP-296]** in 2021 which set out the proposed scope of the assessment including on air quality (dust) and landscape (artificial light). Further details on the responses received on the Scoping Report can be found in the **Scoping Opinion [APP-297]** and ES Appendix 5.1: National Grid's response to the **EIA Scoping Opinion [APP-136].** |
| 5.7.3 | Because of the potential effects of these emissions and infestation, and in view of the availability of the defence of statutory authority against nuisance claims described in Section 4.15, it is important that the potential for these impacts is considered by the applicant and Secretary of State. | Noted |
| 5.7.4 | For energy NSIPs of the type covered by this NPS, some impact on amenity for local communities is likely to be | On the assumption that all mitigation is in place during construction and operation the Project will not result in |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | unavoidable. The aim should be to keep impacts to a minimum, and at a level that is acceptable. | significant effects on amenity. This is evidenced in **ES Chapter 7: Air Quality [APP-147]** which considers impacts from dust, odour, smoke and steam and **ES Chapter 14: Noise and Vibration [APP-256]** which considers noise and vibration, and **ES Chapter 13: Landscape and Visual [APP-226]** assesses the likely significant effects of the Project in relation to lighting during construction on landscape and visual receptors.<br>The **Outline CoCP [APP-300]** sets out the good practice measures to protect the amenity for surrounding environments during construction and operation. Key measures include directional and minimised construction lighting (LV03), locating potentially disruptive activities and equipment away from sensitive receptors like residential areas where practicable (GG22), designing permanent lighting to minimise impacts on adjacent properties (GG31), and ensuring construction lighting is switched off when not in use and positioned to avoid spillover onto nearby land (B06). |
| | **Applicant assessment** | |
| 5.7.5 | The applicant should assess the potential for insect infestation and emissions of odour, dust, steam, smoke, and artificial light to have a detrimental impact on amenity, as part of the ES. | In accordance with Paragraph 5.6.6 of EN-1, in relation to the scope of assessment for insect infestation and emissions of odour, dust, steam, smoke and artificial light; National Grid published the **EIA Scoping Report [APP-288 to APP-296]** in 2021 which set out the proposed scope of the assessment including on air quality (dust) and landscape (artificial light). Further details on the responses received on the Scoping Report can be found in the **Scoping Opinion [APP-297]** and ES Appendix 5.1: National Grid's response to the **EIA Scoping Opinion [APP-136].**<br>No significant effects in respect to odour, dust, steam, smoke and artificial light are expected during the |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | operational phase of the Project. As described in ES **Chapter 7: Air Quality [APP-147],** during the construction phase, construction machinery and vehicles could generate dust and fine particulate matter, particularly through earthwork and soil stripping activities. Machinery and vehicles would also emit exhaust emissions through the combustion of fossil fuels. There is limited potential for the Project to generate dust and emissions during the operational phase, due to the limited activities associated with inspection and maintenance therefore this has been scoped out of the assessment. A dust risk assessment has been undertaken and is reported in **ES Appendix 7.3: Air Quality Assessment Results [APP-150]**. The impact of light pollution is assessed **ES Chapter 8: Ecology and Biodiversity [AS-026] and ES Chapter 13: Landscape and Visual [APP-226]** which present the assessment of likely significant ecology and biodiversity, and landscape and visual effects that could result from the Project including lighting impacts.<br>The **Outline CoCP [APP-300]** sets out the good practice measures to protect Ecology, Biodiversity, and Landscape and Visual environments during construction and operation. Key measures include directional and minimised construction lighting (LV03), locating potentially disruptive activities and equipment away from sensitive receptors like residential areas and ecological sites where practicable (GG22), designing permanent lighting to minimise impacts on adjacent properties, protected species, and habitats (GG31), and ensuring construction lighting is switched off when not in use and positioned to avoid spillover onto nearby land or vegetation (B06).<br>During construction, the Project would comply with the good practice measures outlined within Table 6.1 of the **Outline CoCP [APP-300]** to reduce the potential for |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | adverse impacts due to the release of emissions (commitment AQ01, AQ02 and S01) or insect infestation (commitment GG23). For example, in accordance with commitment GG23 within the **Outline CoCP [APP-300]** site layout and housekeeping measures would be implemented by the contractor during the set-up of the temporary compounds preventing pests and vermin control, and treating any infestation promptly, including arrangements for the proper storage and disposal of waste produced on site.<br>The **Statement of Statutory Nuisance [APP-083]** identifies the matters set out in Section 79(1) of the EPA 1990 in respect of statutory nuisance and considers whether the Project has the potential to cause nuisance.<br>The **Outline CoCP [APP-300]** include good practice measures to avoid or reduce the effects of dust, lighting, noise and vibration. These measures would reduce impacts that could otherwise result in nuisance during construction. The measures set out within **7.2 Outline CoCP [APP-300]** will be secured via Requirement 4(a) (Construction Management Plans) of **3.1 Draft DCO [APP-056]** within the final CoCP.<br>National Grid and their contractor would carry out all work in accordance with the CoCP during the construction of the Project unless otherwise agreed with the relevant planning authority.<br>With the good practice measures in place, no breach of Section 79(1) of the EPA 1990 is expected as a result of the Project. |
| 5.7.6 | In particular, the assessment provided by the applicant should describe:<br>• the type, quantity and timing of emissions | No residual significant effects in respect to emissions during operation of the Project are expected. As described in **ES Chapter 7: Air Quality [APP-147]** during the construction phase, construction machinery and vehicles |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | • aspects of the development which may give rise to emissions<br>• premises or locations that may be affected by the emissions<br>• effects of the emission on identified premises or locations<br>• measures to be employed in preventing or mitigating the emissions | could generate dust and fine particulate matter, particularly through earthwork and soil stripping activities. Machinery and vehicles would also emit exhaust emissions through the combustion of fossil fuels. A dust risk assessment has been undertaken and is reported in **ES Appendix 7.3: Air Quality Assessment Results [APP-150]**. During construction, the Project would comply with the good practice measures within the **Outline CoCP [APP-300]** to reduce the potential for adverse impacts due to the release of emissions or infestation. In addition, a statement of statutory nuisance has been undertaken. The **Statement of Statutory Nuisance [APP-083]** concludes that with the good practice measures identified in the **Outline CoCP [APP-300]**, no breach of Section 79(1) of the EPA 1990 is expected as a result of the Project. |
| | **Mitigation** | |
| 5.7.8 | Mitigation measures may include one or more of the following:<br>• engineering: prevention of a specific emission at the point of generation; control, containment and abatement of emissions if generated<br>• lay-out: adequate distance between source and sensitive receptors; reduced transport or handling of material<br>• administrative: limiting operating times; restricting activities allowed on the site; implementing management plans | During construction, the Project would comply with the good practice measures within the **Outline CoCP [APP-300]** to reduce the potential for adverse impacts due to the release of emissions or infestation. These include control measures such as turning off machinery when not in use (AQ01), layout measures such as locating equipment away from sensitive receptors where practicable (GG22) and the implementation of management plans (AQ01). |
| 5.7.9 | Construction should be undertaken in a way that reduces emissions, for example the use of low emission mobile plant during the construction, and demolition phases as appropriate, and consideration should be given to making | National Grid has identified a number of good practice measures, which generally comprise measures imposed through legislative requirements or represent standard sector good practices. These include GG24 of the **Outline CoCP [APP-300]**, which states: Plant and construction |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | these mandatory in Development Consent Order requirements. | vehicles (not including construction worker private vehicles) will conform to relevant applicable standards for the vehicle type which will have been defined in the Outline CoCP.<br>Vehicles will be correctly maintained and operated in accordance with manufacturer's recommendations and in a responsible manner. All plant and vehicles will be required to switch off their engines when not in use and when it is safe to do so.<br>The CoCP is secured by Requirement 4 of Schedule 3 of the **Draft DCO [APP-056]**. |
| 5.7.10 | Demolition considerations should be embedded into designs at the outset to enable demolition techniques to be adopted that remove the need for explosive demolition. | **Section 1.11 of ES Chapter 4: Project Description [APP-130]** considers decommissioning of the Project and concludes that there are currently no specific plans to decommission the Project. It is expected that the transmission of electricity would continue for as long as there is a business case for doing so and that any decommissioning activity would occur decades into the future. The pylons comprise open, lattice structures which can be easily dismantled. It is expected that proposals for decommissioning would be subject to separate consenting procedures, including environmental assessment of the proposed activities, and taking account of the baseline as it exists at the time of decommissioning. The infrastructure proposed as part of the Project would comprise of overhead line, underground cables and substations all of which do not require explosive demolition in the event of decommissioning – as per Table 4.11 in **ES Chapter 4: Project Description [APP-130].** |
| 5.7.11 | A construction management plan may help clarify and secure mitigation | National Grid has produced an **Outline CoCP [APP-300]** which sets out the required mitigation measures and environmental commitments that will be implemented during the construction phase of the Project. The |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | commitments would be secured by Requirement 4 of Schedule 3 in the **Draft DCO [APP-056].** |
| | **Secretary of State decision making** | |
| 5.7.12 | The Secretary of State should satisfy itself that:<br>• an assessment of the potential for artificial light, dust, odour, smoke, steam and insect infestation to have a detrimental impact on amenity has been carried out<br>• that all reasonable steps have been taken, and will be taken, to minimise any such detrimental impacts | See responses to 5.7.5 |
| **5.8** | **Flood Risk** | |
| 5.8.3 | ~~The~~ Protecting communities around the country from flooding is one of the government's priorities. The EA has a statutory duty to publish the National Flood and Coastal Erosion Risk Management ~~Policy Statement sets out our ambition to create a nation more resilient~~Strategy for England. The Strategy describes what needs to ~~future~~be done by all risk management authorities involved in flood and coastal erosion risk~~. It outlines policies and actions which will accelerate progress to better protect and better prepare the country against flooding and coastal erosion.~~ management for the benefit of people and places. The industry should consider any updates to government ~~policy~~policies and the statutory Strategy and apply updated approaches as a matter of priority. | The **FRA [APP-331]** has been submitted as part of the application for development consent focussing on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. As detailed within the FRA flooding from other sources such as sewers, reservoirs and other artificial sources are scoped out of the assessment. National Grid also circulated a draft version of the FRA to the Environment Agency, IDB and LLFA ahead of the submission of the application for development consent for their consideration and comment. Subsequently, the consultees' feedback was taken into consideration whilst preparing the submission version of the FRA.<br>A **Draft Statement of Common Ground with the Environment Agency [APP-103]** has been produced. |
| 5.8.4 | All buildings in flood risk areas can improve their preparedness to reduce costs and disruption to key public services when a flood happens. Where infrastructure is not better protected as part of a wider community scale flood defence scheme, those who own and run infrastructure sites – whether in public or private hands – are expected to take action to keep water out, minimise the damage if | All of the proposed new substations and extensions to existing substations are located in Flood Zone 1. Six of the proposed CSE compounds are located in Flood Zone 1. The CSE compound site at Wenham Grove is partially situated in Flood Zone 3 following the release of updated flood mapping dataset from the Environment Agency. This CSE compound would be laid out in accordance with the |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | water gets in through flood-resilient materials, and reduce the disruption caused. This includes effective contingency planning to mitigate the impacts of flooding on the delivery of important services. | sequential approach, whereby the most vulnerable components are located in areas at lowest risk of flooding. The requirements for compensation of loss of floodplain storage associated with the pylons is addressed in the following sub-section and secured by commitment W17 in the **Outline CoCP [APP-300]**. No discernible loss of floodplain storage is associated with the CSE compound, associated above ground infrastructure has a very limited footprint.<br>The **FRA [APP-331]** has concluded that the Project during its construction would be generally at low risk of flooding from rivers. Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures set out in the **Outline CoCP [APP-300]**. These measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk as set out in **ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]**.<br>During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the FRA. Above ground structures such as pylons and below ground structures such as the underground cable are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. |
| 5.8.5 | Climate change is already having an impact and is expected to have an increasing impact on the UK throughout this century. The UK Climate Projections 2018 show an increased chance of milder, wetter winters and hotter, drier summers in the UK, with more intensive rainfall | See response to 4.10.3 |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | causing flooding. Sea levels will continue to rise beyond the end of the century, increasing risks to vulnerable coastal communities. Within the lifetime of energy projects, these factors will lead to increased flood risks in areas susceptible to flooding, and to an increased risk of the occurrence of floods in some areas which are not currently thought of as being at risk. A robust approach to flood risk management is a vital element of climate change adaptation; the applicant and the Secretary of State should take account of the policy on climate change adaptation in Section 4.10. | |
| 5.8.9 | If, following application of the Sequential Test, it is not possible~~,~~ (taking into account wider sustainable development objectives~~),)~~ for the ~~Project~~project to be located in areas of lower flood risk, the Exception Test can be applied as defined in ~~https://www.gov.uk/guidance/flood-risk-~~Table 2 of the Flood Risk and~~-coastal-change#table2~~ Coastal Change Guidance. The test provides a method of allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. | The **Flood Risk Assessment [APP-331]** demonstrates that the majority of the Project lies within Flood Zone 1 and in zones that are at low risk of flooding from other sources. This has been achieved through an iterative process of design informed by detailed routeing and siting studies and stakeholder feedback.<br>However, given the linear nature of the Project and its large geographical scale, avoidance of all areas of fluvial floodplain and areas at risk of surface water flooding is not practicable and therefore no suitable alternative sites are available for the parts of the Project in higher flood risk areas. Works in these areas however are largely temporary, associated with construction of the Project, and during its operation (and maintenance) are limited to a small number of pylons in the fluvial floodplain (that are of low vulnerability to inundation) and areas at risk of surface water flooding on some localised reaches of permanent routes of access.<br>The Exception Test is therefore triggered and this is reported below. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 5.8.10 and 5.8.11 | The Exception Test is only appropriate for use where the Sequential Test alone cannot deliver an acceptable site. It would only be appropriate to move onto the Exception Test when the Sequential Test has identified reasonably available, lower risk sites appropriate for the proposed development where, accounting for wider sustainable development objectives, application of relevant policies would provide a clear reason for refusing development in any alternative locations identified. Examples could include alternative site(s) that are subject to national designations such as landscape, heritage and nature conservation designations, for example ~~Areas of Outstanding Natural Beauty (AONBs),~~National Landscapes, SSSIs and World Heritage Sites (WHS) which would not usually be considered appropriate.<br><br>Both elements of the Exception Test will have to be satisfied for development to be consented. To pass the Exception Test it should be demonstrated that:<br>• ~~the~~The Project would provide wider sustainability benefits to the community that outweigh flood risk; and<br>• ~~the~~The Project will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall. | To satisfy planning requirements, an Exception Test is required to prove:<br>• The development provides wider sustainability benefits to the community, that outweigh flood risk<br>• The development will be safe for its lifetime, taking account of the vulnerability of its users, without increasing flood risk overall.<br><br>An exception test has been produced, and this is presented in the **FRA [APP-331]**. In response to the first part of the Exception Test the need for the Project is explained in the **Strategic Options Backcheck Report [APP-355]** and summarised in **Chapter 4 of the Planning Statement. [APP-085]**<br><br>With regard to the first part of the test, the Project is Nationally Significant Infrastructure Project that would play an important role in delivering renewable electricity, reliably and safely and will support the UK's move towards net zero. The Project is identified as low carbon infrastructure which is of CNP Infrastructure.<br><br>With regard to the second test, the permanent works associated with the Project which are within Flood Zone 3 are restricted to a small number of pylons for the overhead lines and a partial area of the Little Wenham CSE compound. These elements would be designed such that they are resilient to flooding, ensuring the Project would be safe and could continue to operate during flood event. A suite of measures would be adopted to prevent flood risk increases during construction and operation of the Project. Temporary worksites in floodplains would operate in accordance with the protocols detailed in a Flood Warning and Evacuation Plan (Appendix G of the **Outline CoCP [APP-307]**, to safeguard construction personnel and |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | prevent flood damage to construction equipment and materials. |
| 5.8.12 | Development should be designed to ensure there is no increase in flood risk elsewhere, accounting for the predicted impacts of climate change throughout the lifetime of the development. There should be no net loss of floodplain storage and any deflection or constriction of flood flow routes should be safely managed within the site. Mitigation measures should make as much use as possible of natural flood management techniques. | See response to 5.8.4 |
| | **Applicant assessment** | |
| 5.8.13 | A site-specific flood risk assessment should be provided for all energy Projects in Flood Zones 2 and 3 in England or Defended Flood Zones ~~B~~ and ~~C~~Flood Zones 2 and 3 in Wales. In Flood Zone 1 in England or Flood Zone ~~A~~1 in Wales, an assessment should accompany all proposals involving:<br>• sites of 1 hectare or more<br>• land which has been identified by the EA or NRW as having critical drainage problems<br>• land identified (for example in a local authority strategic flood risk assessment) as being at increased flood risk in future<br>• land that may be subject to other sources of flooding (for example surface water)<br>• where the EA or NRW, Lead Local Flood Authority, Internal Drainage Board or other body have indicated that there may be drainage problems. | A proportionate **FRA [APP-331]** has been prepared to support the DCO application. The FRA assesses sources of flooding from rivers and the sea, surface water and groundwater; flooding from sewers/water mains and reservoirs were scoped out of the assessment. It documents the assessment undertaken to understand whether the Project is likely to be at risk of flooding or is likely to increase flood risk elsewhere in accordance with the requirements set out in Paragraph 5.8.14. |
| 5.8.14 | This assessment should identify and assess the risks of all forms of flooding to and from the Project and demonstrate | The Project has prepared a proportionate **FRA [APP-331]**. The FRA assesses all relevant forms of flooding, although |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | how these flood risks will be managed, taking climate change into account. | flooding from sewers, reservoirs and other artificial sources are scoped out of the assessment.<br>A draft version of the FRA to the Environment Agency, IDB and LLFA ahead of the submission of the application for development consent for their consideration and comment. Subsequently, the consultees' feedback was taken into consideration whilst preparing the submission version of the FRA.<br>The FRA demonstrates that the Project is acceptable with respect to flood risk and the flood risk management measures identified would be secured through the **Outline CoCP [APP-300]** and Requirement 5 of the **Draft DCO [APP-056]**. |
| 5.8.15 | The minimum requirements for Flood Risk Assessments (FRA) are that they should:<br>• ~~be~~Be proportionate to the risk and appropriate to the scale, nature and location of the project;<br>• ~~consider~~Consider the risk of flooding arising from the project in addition to the risk of flooding to the project; ~~take~~<br>• Take the impacts of climate change into account, across a range of climate scenarios, clearly stating the development lifetime over which the assessment has been made;<br>• ~~be~~Be undertaken by competent people, as early as possible in the process of preparing the proposal;<br>• ~~consider~~Consider both the potential adverse and beneficial effects of flood risk management infrastructure, including raised defences, flow channels, flood storage areas and other artificial features, | The Project has prepared a proportionate **FRA [APP-331]**. The FRA assesses all relevant forms of flooding, although flooding from sewers, reservoirs and other artificial sources are scoped out of the assessment.<br>A draft version of the FRA to the Environment Agency, IDB and LLFA ahead of the submission of the application for development consent for their consideration and comment. Subsequently, the consultees' feedback was taken into consideration whilst preparing the submission version of the FRA.<br>The FRA demonstrates that the Project is acceptable with respect to flood risk and the flood risk management measures identified would be secured through the **Outline CoCP [APP-300]** and Requirement 4 of Schedule 3 of the **Draft DCO [APP-056]**. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | together with the consequences of their failure and exceedance;<br>• ~~consider~~Consider the vulnerability of those using the site, including arrangements for safe access and escape;<br>• ~~consider~~Consider and quantify the different types of flooding (whether from natural and human sources and including joint and cumulative effects) and include information on flood likelihood, speed-of-onset, depth, velocity, hazard and duration;<br>• ~~identify~~Identify and secure opportunities to reduce the causes and impacts of flooding overall, making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management;<br>• ~~consider~~Consider the effects of a range of flooding events including extreme events on people, property, the natural and historic environment and river and coastal processes;<br>• ~~include~~Include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been taken into account and demonstrate that these risks can be safely managed, ensuring people will not be exposed to hazardous flooding;<br>• ~~consider~~Consider how the ability of water to soak into the ground may change with development, along with how the proposed layout of the Project may affect drainage systems. Information should include:<br>– ~~i.~~ Describe the existing surface water drainage arrangements for the site<br>– ~~ii.~~ Set out (approximately) the existing rates and volumes of surface water run-off generated by the | |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | site. Detail the proposals for restricting discharge rates<br>– ~~iii.~~ Set out proposals for managing and discharging surface water from the site using sustainable drainage systems and accounting for the predicted impacts of climate change. If sustainable drainage systems have been rejected, present clear evidence of why their inclusion would be inappropriate.<br>– ~~iv.~~ Demonstrate how the hierarchy of drainage options has been followed.219<br>– ~~v.~~ Explain and justify why the types of SuDS220 and method of discharge have been selected and why they are considered appropriate.<br>– ~~vi.~~ Explain how sustainable drainage systems have been integrated with other aspects of the development such as open space or green infrastructure, so as to ensure an efficient use of the site<br>– ~~vii.~~ Describe the multifunctional benefits the sustainable drainage system will provide<br>– ~~viii.~~ Set out which opportunities to reduce the causes and impacts of flooding have been identified and included as part of the proposed sustainable drainage system<br>– ~~ix.~~ Explain how run-off from the completed development will be prevented from causing an impact elsewhere<br>– ~~x.~~ Explain how the sustainable drainage system been designed to facilitate maintenance and, where relevant, adoption. Set out plans for ensuring an | |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | acceptable standard of operation and maintenance throughout the lifetime of the development<br>• ~~detail~~Detail those measures that will be included to ensure the development will be safe and remain operational during a flooding event throughout the development's lifetime without increasing flood risk elsewhere;<br>• ~~identify~~Identify and secure opportunities to reduce the causes and impacts of flooding overall during the period of construction; and<br>• ~~be~~Be supported by appropriate data and information, including historical information on previous events. | |
| 5.8.17 | Development (including construction works) will need to account for any existing watercourses and flood and coastal erosion risk management structures or features, or any land likely to be needed for future structures or features so as to ensure:<br>• Access, clearances and sufficient land are retained to enable their maintenance, repair, operation, and replacement, as necessary;<br>• Their standard of protection is not reduced~~.~~; and<br>• Their condition or structural integrity is not reduced | All of the proposed new substations and extensions to existing substations are located in Flood Zone 1. Six of the proposed CSE compounds are located in Flood Zone 1. The CSE compound site at Wenham Grove is partially situated in Flood Zone 3 following the release of updated flood mapping dataset from the Environment Agency. This CSE compound would be laid out in accordance with the sequential approach, whereby the most vulnerable components are located in areas at lowest risk of flooding. The requirements for compensation of loss of floodplain storage associated with the pylons is addressed in the following sub-section and secured by commitment W17 in the **Outline CoCP [APP-300].** No discernible loss of floodplain storage is associated with the CSE compound, associated above ground infrastructure has a very limited footprint.<br>**ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]** concludes that the River Stour is the only main river that would be crossed by the underground cables. A trenchless crossing technique is proposed for the |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | crossing of the River Stour. ES Chapter 12 also notes that the choice of watercourse crossing technique is dependent on several factors, for example, watercourse size, flood risk sensitivity, ecological sensitivity and location. Where underground cables cross watercourses, it is assumed that ordinary watercourses would be open cut crossings. The crossing methods have been discussed with the Flood Risk Management Authorities who have raised no comments, full response provided in Appendix A of the **FRA [APP-331]**. Details of specific watercourse crossings are identified within **ES Appendix 4.2: Watercourse Crossing Details [APP-132]**. The crossing of the River Stour and other ordinary watercourses along the route would be undertaken in accordance with the standard practice measures documented in the **Outline CoCP [APP-300].**<br>Discussions would also be held with the Environment Agency in relation to any required consents and permits necessary of the works, in accordance with commitment W01 in the **Outline CoCP [APP-300].** The works would subsequently be carried out in accordance with the requirements of these consents, thereby safeguarding water environment receptors. |
| 5.8.18 – 5.8.19 | Applicants for Projects which may be affected by, or may add to, flood risk should arrange pre-application discussions before the official pre-application stage of the NSIP process with the EA or NRW, and, where relevant, other bodies such as Lead Local Flood Authorities, Internal Drainage Boards, sewerage undertakers, navigation authorities, highways authorities and reservoir owners and operators.<br>Such discussions should identify the likelihood and possible extent and nature of the flood risk, help scope the FRA, and identify the information that will be required by | The **FRA [APP-331]** has been informed by consultation and engagement with the relevant flood risk management authorities (the Environment Agency and Lead Local Flood Authorities (LLFAs) (Norfolk County Council, Suffolk County Council, Essex County Council and Thurrock Council)) and the Water Management Alliance Internal Drainage Boards (IDBs), as well as Anglian Water.<br>National Grid also circulated a draft version of the FRA to the Environment Agency, IDB and LLFA ahead of the submission of the application for development consent for their consideration and comment. Subsequently, the |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | the Secretary of State to reach a decision on the application when it is submitted. The Secretary of State should advise applicants to undertake these steps where they appear necessary but have not yet been addressed. | consultees' feedback was taken into consideration whilst preparing the submission version of the FRA.<br>Draft Statements of Common Ground have been prepared with the Environment Agency, LLFA, local authorities, **Anglian Water and Northumbrian Water (Essex and Suffolk Water) [APP-114]**. |
| 5.8.20 | If the EA, NRW or another flood risk management authority has reasonable concerns about the proposal on flood risk grounds, the applicant should discuss these concerns with the EA or NRW and take all reasonable steps to agree ways in which the proposal might be amended, or additional information provided, which would satisfy the authority's concerns. | National Grid has held a number of meetings with relevant organisations, including the Environment Agency and the LLFAs (Norfolk County Council, Suffolk County Council, Essex County Council and Thurrock Council)) and the Water Management Alliance Internal Drainage Boards (IDBs), as well as Anglian Water. Discussions have informed the development of the **FRA [APP-331]**. |
| 5.8.21 to 5.8.23 | The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites with medium risk areas and then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas<br>The technology specific NPSs set out some exceptions to the application of the Sequential Test. However, when seeking development consent on a site allocated in a development plan through the application of the Sequential Test, informed by a strategic flood risk assessment, applicants need not apply the Sequential Test, provided the proposed development is consistent with the use for which the site was allocated and there is no new flood risk information that would have affected the outcome of the test. | A sequential approach has been taken in siting the Project. The majority of the Project lies within Flood Zone 1 and in zones that are at low risk of flooding from other sources.<br>Due to the linear nature of the Project some sections must necessarily be located in areas with a medium or high likelihood of flooding (Flood Zones 2 and 3). Detail on the Sequential and Exception Test are provided in Sections 5.1 and 5.2 of the **FRA [APP-331]** submitted as part of the application for development consent and the Planning Statement Section 7.<br>The Project is classified as 'essential infrastructure' with respect to flooding vulnerability in the NPPF. With regard to the ethos of the Sequential Test, which encourages the location of new development in areas at low risk of flooding, the analysis within the preceding sections has demonstrated that the majority of the Project lies within Flood Zone 1 and in zones that are at low risk of flooding from other sources. This has been achieved through an iterative process of design informed by detailed routeing |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | Consideration of alternative sites should take account of the policy on alternatives set out in Section 4.3 ~~above~~. All projects should apply the Sequential Test to locating development within the site. | and siting studies and stakeholder feedback. However, given the linear nature of the Project and its large geographical scale, avoidance of all areas of fluvial floodplain and areas at risk of surface water flooding is not practicable and therefore cannot be located in an alternative location of lower flood risk. Works in these areas however are largely temporary, associated with construction of the Project, and during its operation (and maintenance) are limited to a small number of pylons in the fluvial floodplain (that are of low vulnerability to inundation) and areas at risk of surface water flooding on some localised reaches of permanent routes of access.<br><br>The substations and CSE compounds represent the parts of the Project that are most vulnerable to flooding. All of the proposed new substations and extensions to existing substations are located in Flood Zone 1. Six of the proposed CSE compounds are located in Flood Zone 1. The CSE compound site at Wenham Grove is partially situated in Flood Zone 3 following the release of updated flood mapping dataset from the Environment Agency. This CSE compound would be laid out in accordance with the sequential approach, whereby the most vulnerable components are located in areas at lowest risk of flooding. The requirements for compensation of loss of floodplain storage associated with the pylons is addressed in the following sub-section and secured by commitment W17 in the **Outline CoCP [APP-300].** No discernible loss of floodplain storage is associated with the CSE compound, associated above ground infrastructure has a very limited footprint. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | **Mitigation** | |
| 5.8.24 | To satisfactorily manage flood risk, arrangements are required to manage surface water and the impact of the natural water cycle on people and property | Drainage would be managed in accordance with the measures in the **Outline CoCP [APP-300].**<br>In accordance with good practice measures W08, W13, W14 and AS05 in the **Outline CoCP [APP-300],** the drainage infrastructure associated with new areas of permanent impermeable land would not alter groundwater recharge patterns and land would be reinstated following construction.<br>A specialised drainage contractor would review the designs and would provide advice to National Grid and its contractor during relevant construction and reinstatement activities. There is therefore no need for planning obligation. |
| 5.8.25 | In this NPS, the term SuDS refers to the whole range of sustainable approaches to surface water drainage management including, where appropriate:<br>• ~~source~~Source control measures including rainwater recycling and drainage;<br>• ~~infiltration~~Infiltration devices to allow water to soak into the ground, that can include individual soakaways and communal facilities;<br>• ~~filter~~Filter strips and swales, which are vegetated features that hold and drain water downhill mimicking natural drainage patterns;<br>• ~~filter~~Filter drains and porous pavements to allow rainwater and run-off to infiltrate into permeable material below ground and provide storage if needed;<br>• ~~basins~~Basins, ponds and tanks to hold excess water after rain and allow controlled discharge that avoids flooding; and<br>• ~~flood~~Flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding | |
| 5.8.26 | Site layout and surface water drainage systems should cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts. | |
| 5.8.27 | The surface water drainage arrangements for any project should, accounting for the predicted impacts of climate | |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | change throughout the development's lifetime, be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, unless specific off-site arrangements are made and result in the same net effect. | |
| 5.8.28 | It may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site. There may be circumstances where it is appropriate for infiltration facilities or attenuation storage to be provided outside the project site, if necessary, through the use of a planning obligation. | |
| 5.8.29 | The sequential approach should be applied to the layout and design of the project. Vulnerable aspects of the development should be located on parts of the site at lower risk and residual risk of flooding. Applicants should seek opportunities to use open space for multiple purposes such as amenity, wildlife habitat and flood storage uses. Opportunities should be taken to lower flood risk by reducing the built footprint of previously developed sites and using SuDS. | A sequential approach has been taken in siting the Project. Due to the linear nature of the Project some sections must necessarily be located in areas with a medium or high likelihood of flooding (Flood Zones 2 and 3). Detail on the Sequential and Exception Test are provided in Sections 5.1 and 5.2 of the **FRA [APP-331]** submitted as part of the application for development consent.<br>With regard to the ethos of the Sequential Test, which encourages the location of new development in areas at low risk of flooding, the analysis within the preceding sections has demonstrated that the majority of the Project lies within Flood Zone 1 and in zones that are at low risk of flooding from other sources. This has been achieved through an iterative process of design informed by detailed routeing and siting studies and stakeholder feedback. However, given the linear nature of the Project and its large geographical scale, avoidance of all areas of fluvial floodplain and areas at risk of surface water flooding is not practicable and therefore cannot be located in an alternative location of lower flood risk. Works in these areas however are largely temporary, associated with |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | construction of the Project, and during its operation (and maintenance) are limited to a small number of pylons in the fluvial floodplain (that are of low vulnerability to inundation) and areas at risk of surface water flooding on some localised reaches of permanent routes of access.<br>The substations and CSE compounds represent the parts of the Project that are most vulnerable to flooding. All of the proposed new substations and extensions to existing substations are located in Flood Zone 1. Six of the proposed CSE compounds are located in Flood Zone 1. The CSE compound site at Wenham Grove is partially situated in Flood Zone 3 following the release of updated flood mapping dataset from the Environment Agency. This CSE compound would be laid out in accordance with the sequential approach, whereby the most vulnerable components are located in areas at lowest risk of flooding. The requirements for compensation of loss of floodplain storage associated with the pylons is addressed in the following sub-section and secured by commitment W17 in the **Outline CoCP [APP-300].** No discernible loss of floodplain storage is associated with the CSE compound, associated above ground infrastructure has a very limited footprint.<br>The permanent Project works which lie within Flood Zone 3 are restricted the Wenham Grove CSE Compound described above and to a small number of pylons for the overhead lines. These are designed such that they are resilient to flooding, ensuring the Project would be safe and could continue to operate. The Exception Test is therefore concluded to be satisfied, as the Project brings significant benefits to the region via its delivery of safe, reliable, and renewable electricity, the Project would not result in an |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | increase in flood risk elsewhere and has been designed to be resilient to flooding throughout its lifetime. |
| 5.8.30 | Where a development may result in an increase in flood risk elsewhere through the loss of flood storage, on-site level-for-level compensatory storage, accounting for the predicted impacts of climate change over the lifetime of the development, should be provided. | Flood risk to and arising from the Project during construction has been assessed and the following points have been concluded:<br>The majority of the Project is at low risk of fluvial flooding. Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures which include managing these worksites in accordance with a Flood Warning and Evacuation Plan. These measures would protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk.<br>As there would be no works within the inter-tidal zone and only limited works in the tidally dominated floodplain (associated with the removal of an existing overhead line), the Project is not anticipated to increase tidal/coastal flood risk during construction. Appropriate measures for managing the residual risk associated with the overhead line removal works in the tidally dominated floodplain of the River Stour have been incorporated into the Outline Flood Warning and Evacuation Plan (**Appendix G of the Outline CoCP [APP-307]**).<br>With respect to surface water flooding, during construction and operation, the Project is considered to be largely at low risk, with some areas at higher risk. Measures would be in place to manage surface water runoff and minimise impacts on the land drainage regime across the Project, including allowances for climate change resilience within the designs of operational SuDS. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | During construction the Project will be at low risk of flooding from groundwater and is not anticipated to increase flood risk from this source. |
| 5.8.33 – 5.8.34 | The receipt of and response to warnings of floods is an essential element in the management of the residual risk of flooding. Flood Warning and evacuation plans should be in place for those areas at an identified risk of flooding.<br>The applicant should take advice from the local authority emergency planning team, emergency services and, where appropriate, from the local resilience forum when producing an evacuation plan for a manned energy project as part of the FRA. Any emergency planning documents, flood warning and evacuation procedures that are required should be identified in the FRA. | An Outline Flood Warning and Evacuation Plan (FWEP) has been prepared as part of the **Outline CoCP [Appendix G, APP-307]**. The key aim of an Outline FWEP is to provide the construction site manager(s) and on-site personnel with clear information on triggers and actions to take should a flood event occur during the construction of the Project, including confirming when a work site should be evacuated. An Outline FWEP also provides key information for planning an evacuation. |
| | **Secretary of State decision making** | |
| 5.8.36 | In determining an application for development consent, the Secretary of State should be satisfied that where relevant:<br>• ~~the~~The application is supported by an appropriate FRA;<br>• ~~the~~The Sequential Test has been applied and satisfied as part of site selection (subject to the exception set out in paragraph 5.8.22 of this NPS, and any technology specific exceptions set out in other NPSs);<br>• ~~a~~A sequential approach has been applied at the site level to minimise risk by directing the most vulnerable uses to areas of lowest flood risk;<br>• ~~the~~The proposal is in line with any relevant national and local flood risk management strategy;<br>• SuDS (as required in the next paragraph on National Standards) have been used unless there is clear evidence that their use would be inappropriate~~.~~; | The **FRA [APP-331]** has been undertaken in line with relevant guidance and planning policy requirements as summarised in the document.<br>A sequential approach has been taken in siting the Project. Due to the linear nature of the Project some sections must necessarily be located in areas with a medium or high likelihood of flooding (Flood Zones 2 and 3). The Exception Test is therefore engaged. Detail on the Sequential and Exception Test are provided in Sections 5.1 and 5.2 of the **FRA [APP-331]** submitted as part of the application for development consent and **Section 7 of the Planning Statement [APP-085].**<br>The substations and CSE compounds represent the parts of the Project that are most vulnerable to flooding. All of the proposed new substations and extensions to existing substations are located in Flood Zone 1. Six of the proposed CSE compounds are located in Flood Zone 1. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | • ~~in~~In flood risk areas the project is designed and constructed to remain safe and operational during its lifetime, without increasing flood risk elsewhere (subject to the exceptions set out in paragraph 5.8.~~42)~~22);<br>• ~~the~~The project includes safe access and escape routes where required, as part of an agreed emergency plan, and that any residual risk can be safely managed over the lifetime of the development; and<br>• ~~land~~Land that is likely to be needed for present or future flood risk management infrastructure has been appropriately safeguarded from development to the extent that development would not prevent or hinder its construction, operation or maintenance. | The CSE compound site at Wenham Grove is partially situated in Flood Zone 3 following the release of updated flood mapping dataset from the Environment Agency. This CSE compound would be laid out in accordance with the sequential approach, whereby the most vulnerable components are located in areas at lowest risk of flooding. The requirements for compensation of loss of floodplain storage associated with the pylons is addressed in the following sub-section and secured by commitment W17 in the **Outline CoCP [APP-300].** No discernible loss of floodplain storage is associated with the CSE compound, associated above ground infrastructure has a very limited footprint.<br>The permanent Project works which lie within Flood Zone 3 are restricted the Wenham Grove CSE Compound described above and to a small number of the pylons for the overhead line. The requirements for compensation of loss of floodplain storage associated with these pylons is addressed in the following sub-section and secured by commitment W17 in the **Outline CoCP [APP-300].**<br>The Sequential and Exception Test has been undertaken. To satisfy planning requirements, an Exception Test is required to prove:<br>• The development provides wider sustainability benefits to the community, that outweigh flood risk<br>• The development will be safe for its lifetime, taking account of the vulnerability of its users, without increasing flood risk overall<br>In response to the first part of the Exception Test the need for the Project is explained in the **Strategic Options Backcheck and Review [APP-355]** and summarised in the **Planning Statement [APP-085]** The Project is nationally significant low carbon infrastructure which is of CNP and |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | one of the essential network reinforcements needed to urgently deliver the UK's net zero target. The reinforcement will also support security and reliability of electricity supply. Without reinforcement, the capacity of the existing electricity network in East Anglia and the South East is insufficient to accommodate the connection of proposed new power sources connecting in the area. The Project would provide this reinforcement, helping to deliver 50 GW of electricity from offshore wind by 2030, and ultimately contributing towards achieving net zero.<br><br>With regard to the second test. the permanent Project works which lie within Flood Zone 3 are restricted to a small number of pylons for the overhead lines and a partial area of the Wenham Grove CSE Compound. These elements would be designed such that they are resilient to flooding, ensuring the Project would be safe and could continue to operate. A suite of measures would be adopted to prevent flood risk increases during construction and operation of the Project. Temporary worksites in floodplains would operate in accordance with the protocols detailed in a Flood Warning and Evacuation Plan (**Appendix G of the Outline CoCP [APP-307]**), to safeguard construction personnel and prevent flood damages to construction equipment and materials.<br><br>The Project would not result in an increase in flood risk elsewhere and has been designed to be resilient to flooding throughout its lifetime.<br><br>An Outline Flood Warning and Evacuation Plan (FWEP) has been prepared as part of the **Outline CoCP** [**Appendix G, APP-307**]. The key aim of an Outline FWEP is to provide the construction site manager(s) and on-site personnel with clear information on triggers and actions to take should a flood event occur during the construction of |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | the Project, including confirming when a work site should be evacuated. An Outline FWEP also provides key information for planning an evacuation. |
| 5.8.37 | For energy projects which have drainage implications, approval for the project's drainage system, including during the construction period, will form part of the development consent issued by the Secretary of State. The Secretary of State will therefore need to be satisfied that the proposed drainage system complies with any National Standards published by Ministers under paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010. | The construction phase drainage would be managed in accordance with the commitments GG38 and AS05 of the **Outline CoCP [APP-300]**. As set out in commitment W08, surface water runoff from operational above ground infrastructure will be managed in accordance with the requirements and standards of the relevant Lead Local Flood Authority (LLFA) and adopt suitable sustainable drainage techniques that will be maintained for the Projects lifetime, designed to allow for climate change resilience. |
| 5.8.38 | In addition, the Development Consent Order, or any associated planning obligations, will need to make provision for appropriate operation and maintenance of any SuDS throughout the project's lifetime. Where this is secured through the adoption of any SuDS features, any necessary access rights to property will need to be granted. | As documented in the **FRA [APP-331]** and **Outline CoCP [APP-300]** Measures to manage surface water runoff from operational above ground infrastructure and to maintain existing overland flow routes, for example the proposed box culverts at Tilbury North Substation and the eastern of the two CSE compounds, will be developed liaising with the Lead Local Flood Authority (LLFAs). Such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime. Surface water runoff will be captured using sustainable drainage techniques that will be designed to allow for climate change resilience and with consideration of exceedance flow routes. |
| 5.8.39 | Where relevant, the Secretary of State should be satisfied that the most appropriate body is being given the responsibility for maintaining any SuDS, taking into account the nature and security of the infrastructure on the proposed site. Responsible bodies could include, for example the landowner, the relevant lead local flood authority or water and sewerage company (through the | Where permanent drainage is installed, it will be inspected and maintained by the Applicant, as required, so that it can continue to operate the Project to the design standard, safeguarding surface and groundwater quality. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | Ofwat approved Sewerage Sector Guidance), or another body, such as an Internal Drainage Board. | |
| 5.8.41 | Energy Projects should not normally be consented within Flood Zone 3b, or Zone C2 in Wales, or on land expected to fall within these zones within its predicted lifetime. This may also apply where land is subject to other sources of flooding (for example surface water). However, where essential energy infrastructure has to be located in such areas, for operational reasons, they should only be consented if the development will not result in a net loss of floodplain storage, and will not impede water flows. | See response to 5.8.36 |
| 5.8.42 | Exceptionally, where an increase in flood risk elsewhere cannot be avoided or wholly mitigated, the Secretary of State may grant consent if they are satisfied that the increase in present and future flood risk can be mitigated to an acceptable and safe level and taking account of the benefits of, including the need for, nationally significant energy infrastructure as set out in Part 3 above. In any such case the Secretary of State should make clear how, in reaching their decision, they have weighed up the increased flood risk against the benefits of the project, taking account of the nature and degree of the risk, the future impacts on climate change, and advice provided by the EA or NRW and other relevant bodies. | See response to 5.8.30 |
| **5.9** | **Historic Environment** | |
| 5.9.~~8~~10 | Impacts on heritage assets specific to types of infrastructure are included in the technology specific NPSs. | Noted. |
| | **Applicant assessment** | |
| 5.9.~~9~~11 | The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along | **ES Chapter 11: Historic Environment [AS-068]** presents the assessment of the Project on heritage assets. The ES Chapter is supported by the following appendices: |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | with how the mitigation hierarchy has been applied in the ES (see Section 4.3). This should include consideration of heritage assets above, at, and below the surface of the ground. Consideration will also need to be given to the possible impacts, including cumulative, on the wider historic environment. The assessment should include reference to any historic landscape or seascape character assessment and associated studies as a means of assessing impacts relevant to the proposed project. | • **Appendix 11.1 Historic Environment Baseline Report [APP-209]**<br>• **Appendix 11.2 Historic Environment Assessment Tables [AS-070]**<br>• **Appendix 11.3 EACN Substation Geophysical Survey Report [APP-211]**<br>• **Appendix 11.4 Geophysical Survey Results Report [AS-072 – AS-077]**<br>• **Appendix 11.5 Trial Trenching Results Report [AS-078]**<br>• **Appendix 11.6 Geoarchaeological and Archaeological Monitoring of Ground Investigation Works Report [APP-214]**<br>• **Appendix 11.7 Assessment of Harm to Designated Heritage Assets [APP-215]**<br>National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse residual effects on cultural heritage and archaeological assets. Mitigation measures to reduce impacts on archaeology are set out in the **Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMS-OWSI) [APP-328]** which includes preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 5.9.~~10~~ 12–<br>5.9.~~11~~13 | As part of the ES the applicant should provide a description of the significance of the heritage assets affected by the proposed development, including any contribution made by their setting. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum, the applicant should have consulted the relevant Historic Environment Record (or, where the development is in English or Welsh waters, Historic England or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development's impact.<br>Where a site on which development is proposed includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, accurate representative visualisations may be necessary to explain the impact. | The heritage assets are described in **ES Appendix 11.1: Historic Environment Baseline Report [APP-209]**, which in turn is supported by a gazetteer of heritage assets from archaeological remains, historic landscape features and historic buildings, both designated and non-designated. All publicly available historic environment data has been acquired from open data sources and the county HER for Norfolk, Suffolk, Essex and Thurrock. **ES Appendix 11.2: Historic Environment Assessment Tables [AS-070]** presents a proportionate assessment of the impacts of the Project on the heritage assets, including their setting.<br>**Section 11.4 of ES Chapter 11: Historic Environment [AS-068]** describes the methodology and data sources used to establish the baseline environment and the approach to consider and assess the significance of potential effects on the historic environment. |
| 5.9.~~12~~14 | The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents. Studies will be required on those heritage assets affected by noise, vibration, light and indirect impacts, the extent and detail of these studies will be proportionate to the significance of the heritage asset affected. | Noted. **ES Chapter 11: Historic Environment [AS-068]** presents the assessment of the Project on heritage assets. ES Appendix 11.2 Historic Environment Assessment Table to **ES Chapter 11: Historic Environment [AS-070]** lists the heritage assets which could be impacted by the Project including potential impacts from noise, vibration, light and indirect impacts. and should be read in conjunction with the following reports and figures<br>• **ES Figure 11.1: Historic Environment Study Area [APP-216]** |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | • **ES Figure 11.2: Designated Heritage Assets Assessed in the ES Chapter [AS-080]**<br>• **ES Figure 11.3: Non-Designated Heritage Assets Assessed in the ES Chapter [AS-081]**<br>• **ES Figure 11.4: Phase 1 and 2 Geophysical Survey Areas and Archaeological Trial Trenching Priority Areas [AS-082]**<br>• **ES Figure 11.5: Historic Environment and LVIA Viewpoint Locations [APP-220]**<br>• **ES Appendix 11.1: Historic Environment Baseline Report [APP-209]**<br>• **ES Appendix 11.2: Historic Environment Assessment Tables [AS-070]**<br>• **ES Appendix 11.3: EACN Substation Geophysical Survey Report [APP-211]**<br>• **ES Appendix 11.4: Geophysical Survey Results Report [AS-072 – AS-077]**<br>• **ES Appendix 11.5: Trial Trenching Results Report [AS-078]**<br>• **ES Appendix 11.6: Geoarchaeological and Archaeological Monitoring of Ground Investigation Works Report [APP-214]**<br>• **ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets [APP-215]** |
| 5.9.~~14~~16 | Careful consideration in preparing the scheme will be required on whether the impacts on the historic environment will be direct or indirect, temporary, or permanent. | Direct, indirect, temporary and permanent effects to heritage assets are presented in **ES Chapter 11: Historic Environment [AS-068]**. |
| 5.9.~~15~~17 | Applicants should look for opportunities for new development within Conservation Areas and World | The Project does not propose any new development in Conservation Areas or World Heritage Sites. **Appendix** |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably. | **11.1: Historic Environment Baseline Report [APP-209]** provides a detailed overview of the heritage assets, including Conservation Areas which are within the defined Study Area. |
| | **Mitigation** | |
| 5.9.~~16~~18 | A documentary record of our past is not as valuable as retaining the heritage asset, and therefore the ability to record evidence of the asset should not be a factor in deciding whether such loss should be permitted, and whether or not consent should be given. | The **Outline AMS-OWSI [APP-328]** stipulate the need for preservation by record wherever practicable, particularly for high value assets. Further mitigation, including the recording of evidence of the asset, is only considered where preservation in situ is not proportionate to the value of the asset. |
| 5.9.~~17~~19 | Where the loss of the whole or part of a heritage asset's significance is justified, the Secretary of State will require the applicant to record and advance understanding of the significance of the heritage asset before it is lost (wholly or in part). The extent of the requirement should be proportionate to the asset's importance and significance and the impact. The applicant should be required to publish this evidence and to deposit copies of the reports with the relevant Historic Environmental Record. They should also be required to deposit the archive generated in a local museum or other public repository willing to receive it. | The **Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** sets out appropriate additional mitigation for archaeology. The Project's mitigation strategy has been developed in consultation with heritage stakeholders, including the Council and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording. |
| 5.9.~~18~~20 | Where appropriate, the Secretary of State will impose requirements on the Development Consent Order to ensure that the work is undertaken in a timely manner, in accordance with a written scheme of investigation that complies with the policy in this NPS and which has been agreed in writing with the relevant local authority, and to ensure that the completion of the exercise is properly secured. | The strategy for archaeological mitigation is defined along with further detail regarding specific sites within the **Outline AMS-OWSI [APP-328]**. This document has been informed by discussions with historic environment advisers from the respective LPA and Historic England.<br>The Outline AMS-OWSI is secured through Requirement 5 of Schedule 3 of the **Draft DCO [APP-056]** which states that the authorised development must be undertaken in accordance with the AMS-OWSI. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 5.9.~~19~~21 and 5.9.~~20~~22 | Where the loss of significance of any heritage asset has been justified by the applicant on the merits of the new development and the significance of the asset in question, the Secretary of State should consider:<br>• ~~imposing~~Imposing a requirement in the Development Consent Order; and<br>• ~~requiring~~Requiring the applicant to enter into an obligation<br>• That will prevent the loss occurring until the relevant part of the development has commenced, or it is reasonably certain that the relevant part of the development is to proceed. | **Environmental Statement Chapter 11- Historic Environment [APP-208]** provides an assessment of the Projects likely significant effects on designated and non-designated heritage assets. The Project will not result in any substantial harm to designated heritage assets.<br>Paragraph 7.2.57 of **5.6 Planning Statement [APP-85]** addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the SoS, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the NPSs. Given that **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-214]** demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. |
| 5.9.~~21~~22 | Where there is a high probability (based on an adequate assessment) that a development site may include, as yet undiscovered heritage assets with archaeological interest, the Secretary of State will consider requirements to ensure appropriate procedures are in place for the identification | The strategy for archaeological mitigation is defined along with further detail regarding specific sites within the **Outline AMS-OWSI [APP-328]**. The Outline AMS-OWSI is secured through Requirement 5 of Schedule 3 of the **Draft DCO [APP-056]**, which states that the authorised development |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | and treatment of such assets discovered during construction. | must be undertaken in accordance with the Outline AMS-OWSI. |
| | **Secretary of State decision making** | |
| 5.9.~~22~~23 | In determining applications, the Secretary of State should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development, including by development affecting the setting of a heritage asset ~~(including assets whose setting may be affected by the proposed development),~~ taking account of:<br>• ~~relevant~~Relevant information provided with the application and, where applicable, relevant information submitted during the examination of the application<br>• ~~any~~Any designation records, including those on the National Heritage List for England, or included on Cof Cymru for Wales.<br>• ~~historic~~Historic landscape character records<br>• ~~the~~The relevant Historic Environment Record(s), and similar sources of information<br>• ~~representations~~Representations made by interested parties during the examination process<br>• ~~expert~~Expert advice, where appropriate, and when the need to understand the significance of the heritage asset demands it | **Section 11.4 of ES Chapter 11: Historic Environment [AS-068]** describes the methodology and data sources used to establish the baseline and the approach to consider and assess the significance of potential effects on the historic environment.<br>Heritage assets have been identified within the Study Area through desk-based assessment and through the site surveys. This information has been used to assign assets a value (sensitivity) as defined in **ES Chapter 5: EIA Approach and Method [APP-135].** The effects on heritage assets caused by change within their setting is assessed in **ES Chapter 11: Historic Environment [AS-068]**. Further details in relation to the setting of heritage assets is presented in **ES Appendix 11.1: Historic Environment Baseline Report [APP-209]**. |
| 5.9.~~23~~24 | The Secretary of State must also comply with the requirements on listed buildings, conservation areas and scheduled monuments, set out in ~~Regulation~~regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010. | Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010 (as amended) (HM Government, 2010) Regs – Having regard to the desirability of preserving listed buildings, conservation areas and scheduled monuments and their settings where a development would affect these matters. This is considered in **Chapter 7 of the Planning Statement [APP-085], ES Chapter 11: Historic** |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | **Environment [AS-068] and ES Appendix 11.2 Historic Environment Assessment Tables [AS-070]**.<br>**ES Chapter 11: Historic Environment [AS-068]** presents the results of the assessment on listed buildings, conservation areas and scheduled monuments. No listed buildings or buildings that contribute to the character of a conservation area would be demolished as a result of the Project, therefore the assessment presented in **ES Chapter 11: Historic Environment [AS-068]** focuses on the effects through change to setting. No physical impacts are predicted to scheduled monuments therefore the assessment focuses on the effects through change to setting. |
| 5.9.~~27~~28 | When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance. | **ES Chapter 11: Historic Environment [AS-068]** presents the assessment of the likely significant cultural heritage effects that could result from the Project.<br>Through sensitive routeing and siting National Grid has sought to avoid and reduce, as far as possible, adverse effects on identified heritage assets. National Grid is proposing to utilise low height pylons for the section of overhead line that passes between Great Waltham conservation area/ Langleys registered park and garden and Little Waltham Conservation Area, to reduce visibility of the alignment from Langleys House and more distant elements of the conservation areas and park and garden.<br>The Project has been designed to avoid and reduce impacts to heritage assets. This has been informed by the geophysical survey and the evaluation trenching, as well as other surveys such as the walkover survey.<br>Both the NPS EN-1 and NPPF require an assessment of harm to heritage significance. EN-1 and the NPPF further categorise that harm into 'substantial' and 'less than substantial'. The PPG which supports the NPPF heritage |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | policies expects potential harm to designated heritage assets to be categorised as either less than substantial harm or substantial harm (which includes total loss) and that within each category of harm identified, the extent of the harm should be clearly articulated. **ES Appendix 11.7 [APP-215]** concludes that none of the harm is of so considerable a scale as to be classified as substantial harm.<br>It is considered that the lower less than substantial harm and mid less than substantial harm reported in **Appendix 11.7 [APP-215]** does equate to a loss of significance to heritage assets. This loss of significance should be considered against the wider public benefit associated with the delivery of this Project (considered at Paragraph 5.9.32 and 5.9.33.<br>The strategy for archaeological mitigation is defined along with further detail regarding specific sites within the **Outline AMS-OWSI [APP-328]**. |
| 5.9.~~28~~29 to 5.9.~~30~~31 | The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.<br>Substantial harm to or loss of significance of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional.<br>Substantial harm to or loss of significance of assets of the highest significance, including Scheduled Monuments; Protected Wreck Sites; Registered Battlefields; grade I and II* Listed Buildings; grade I and II* Registered Parks and | An assessment of impact to the heritage significance of assets is included in **ES Chapter 11: Historic Environment [AS-068] and ES Appendix 11.2: Historic Environment Assessment Tables [AS-070]**.<br>**ES Chapter 11: Historic Environment [AS-068]** reports the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. ES Chapter 11 concludes that the |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
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| | Gardens; and World Heritage Sites, should be wholly exceptional. | Project would not result in substantial harm to any heritage assets. |
| 5.9.~~31~~32 | Where the proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to, or loss of, significance is necessary to achieve substantial public benefits that outweigh that harm or loss, or all the following apply:<br>• ~~the~~The nature of the heritage asset prevents all reasonable uses of the site;<br>• ~~no~~No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;<br>• ~~conservation~~Conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and<br>• ~~the~~The harm or loss is outweighed by the benefit of bringing the site back into use. | An assessment of impact to the heritage significance of assets is included in **ES Chapter 11: Historic Environment [AS-068] and ES Appendix 11.2: Historic Environment Assessment Tables [AS-070]**.<br>**ES Chapter 11: Historic Environment [AS-068]** reports the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. ES Chapter 11 concludes that the Project would not result in substantial harm to any heritage assets.<br>It is considered that the lower less than substantial harm and mid less than substantial harm reported in **Appendix 11.7 [APP-215]** does equate to a loss of significance to heritage assets.<br>The substantial public benefits and need for the Project, as set out in Chapter 3 of the~~is~~ P**lanning Statement [APP-085],** contributes towards meeting national energy security objectives, clearly and demonstrably outweigh the less than substantial harm, at the medium and lower end of the spectrum, to the designated heritage assets. The potential for harm or loss of significance upon non- designated heritage assets affected by the Project is also clearly outweighed by the substantial public benefits and need for the Project |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 5.9.~~32~~33 | Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use. | **ES Chapter 11: Historic Environment [AS-068]** concludes that the Project would not result in substantial harm to any designated historic assets but will result in less than substantial harm and mid less than substantial harm reported in **Appendix 11.7 [APP-215]** does equate to a loss of significance to heritage assets.<br>The substantial public benefits and need for the Project, as set out in the **Planning Statement [APP-085]**, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives, clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage asset of schedulable quality. |
| 5.9.~~33~~34 | In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. | The substantial public benefits and need for the **Project, as set out in Chapter 3 of the~~is~~ Planning Statement [APP-085]**, contributes towards meeting national energy security objectives, clearly and demonstrably outweigh the less than substantial harm, at the medium and lower end of the spectrum, to the designated heritage assets. The potential for harm or loss of significance upon non- designated heritage assets affected by the Project is also clearly outweighed by the substantial public benefits and need for the Project providing the judgement required under paragraph 5.9.33 of NPS EN-1. |
| 5.9.~~36~~37 | When considering applications for development affecting the setting of a designated heritage asset, the Secretary of State should give appropriate weight to the desirability of preserving the setting such assets and treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the Secretary of State should give great weight to any negative effects, when weighing them | See response to 5.9.32.<br>Overall, the need for the Project is set out in the **Strategic Options Backcheck and Review [APP-355]** to which significant weight should be afforded. 'Need' is also clearly established by the NPS, which considers the need for new electricity transmission and distribution infrastructure as urgent as it supports the transition of the economy to net |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval. | zero. The Project is also now considered Critical National Priority Infrastructure as per this NPS. |
| **5.10** | **Landscape and Visual** | |
| | **Applicant assessment** | |
| 5.10.16 – 5.10.17 | The applicant should carry out a landscape and visual impact assessment and report it in the ES, including cumulative effects (see Section 4.3). Several guides have been produced to assist in addressing landscape issues.<br>The landscape and visual assessment should include reference to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project. The applicant's assessment should also take account of any relevant policies based on these assessments in local development documents in England and local development plans in Wales. | **ES Chapter 13: Landscape and Visual [APP-226]** presents the landscape and visual assessment. Reference to landscape character assessments have been made in **ES Chapter 13: Landscape and Visual [APP-226]** accompanied by:<br>• **ES Appendix 13.1: Landscape and Visual Methodology [APP-227]**<br>• **ES Appendix 13.2: Landscape Baseline and Assessment [APP-228]**<br>• **ES Appendix 13.3: Visual Baseline and Assessment [APP-229 to APP-232]**<br>• **ES Appendix 13.4: Residential Visual Amenity Assessment [APP-233 to APP-234]**<br>• **ES Appendix 13.5: National Landscape Assessment Study [APP-235]**<br>• **ES Appendix 13.6: Arboricultural Impact Assessment (AIA) [APP-236]**<br>Published landscape character documents have been used as a means of assessing landscape effects, as described in **ES Appendix 13.2: Landscape Baseline and Assessment [APP-228]** Relevant local development plan documents that were taken into account in the assessment are set out in **Section 13.2: Regulatory and Planning Policy Context of ES Chapter 13 [APP-226].** |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 5.10.19 | The applicant should consider landscape and visual matters in the early stages of siting and design, where site choices and design principles are being established. This will allow the applicant to demonstrate in the ES how negative effects have been minimised and opportunities for creating positive benefits or enhancement have been recognised incorporated into the design, delivery and operation of the scheme. | Embedded measures have been integral in reducing, and where possible, avoiding, the landscape and visual effects of the Project. Landscape and visual matters were considered in the early stages of siting and design. **ES Chapter 3: Alternatives [APP-127]** which documents the key environmental factors that were considered in the optioneering and design evolution process, alongside the **Design Development Report [APP-122]**, Design and Access Statement **[APP-353]**, **Design Approach for Site Specific infrastructure [APP-354] and ES Chapter 3: Alternatives [APP-127]** summarises the different choices made during the design process.<br><br>**Chapter 5 of the Planning Statement [APP-085]** sets out how planning policy, namely EN-1 and EN-5, as well as the requirements of the Electricity Act and the principles of the Holford and Horlock Rules have influenced the options appraisal process; demonstrating how such policy objectives have been embedded into the design of the Project. |
| 5.10.20 | The assessment should include the effects on landscape components and character (including key characteristics) during construction and operation. For projects which may affect a National Park, The Broads or ~~an Areas of Outstanding Natural Beauty~~a National Landscape the assessment should include effects on the natural beauty and special qualities of these ~~areas'~~areas. | **ES Chapter 13: Landscape and Visual [APP-226]** presents the landscape and visual assessment for the Project. In addition, **ES Appendix 13.5: National Landscape Assessment Study [APP-235]** is more specific and provides an assessment on National Landscapes.<br><br>In accordance with national policy requirements, the Project has been designed following the mitigation hierarchy and has avoided impacts where possible through the routeing and siting process. This includes the decision to underground through Dedham Vale National Landscape and adjacent landscapes. A CSE compound would be located to the east of Raydon Great Wood, approximately 2 km to the north-east of the National Landscape at its |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | closest point. The Project would then transition back to overhead line, heading north away from the National Landscape. To the south-east of Dedham Vale National Landscape, the underground cable route would continue outside the National Landscape and terminate at a new substation known as the EACN Substation, approximately 1.3 km south of the National Landscape.<br><br>**ES Appendix 13.5: National Landscape Assessment Study [APP-235]** considers the natural beauty, character and special qualities of Dedham Vale National Landscape. The National Landscape Assessment Study also sets out an assessment of the impacts of the Project on the special qualities of the National Landscape and how this may impact on the National Landscape's ability to deliver its statutory purpose to conserve and enhance natural beauty. The assessment concludes that there would be significant adverse effects during construction. The assessment of effects during operation (and maintenance) concludes that minor and not significant (adverse) effects would be experienced once the underground cable has been installed and the underground corridor reinstated. |
| 5.10.21 | The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include light pollution effects, including on dark skies, local amenity, and nature conservation. | **ES Chapter 13: Landscape and Visual [APP-226] and ES Appendix 13.3: Visual Baseline and Assessment [APP-229 to APP-232]** present the assessment of effects on views and visual amenity during construction and operation of the Project. This includes consideration of the effects of lighting, where applicable. |
| 5.10.22 | The assessment should also address the landscape and visual effects of noise and light pollution, and other emissions (see Section 5.2 and Section 5.7), from construction and operational activities on residential amenity and on sensitive locations, receptors and views, and how these will be minimised. | The route corridor would largely occupy a rural area.<br><br>In considering alternative strategic options, potential effects on urban areas and residential and recreational receptors were considered. From a socio-economic perspective, the strategic option taken forward would not affect any major |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | areas of economic activity or tourism assets of national importance.<br>The effects of lighting on landscape and visual receptors is considered where applicable, as set out in **ES Appendix 13.2: Landscape Baseline and Assessment [APP-228]** and **ES Appendix 13.3: Visual Baseline and Assessment [APP-229 to APP-232]**. Effects on residential visual amenity are set out in **ES Appendix 13.4: Residential Visual Amenity Assessment [APP-233 to APP-234].** |
| 5.10.24 | Applicants should consider how landscapes can be enhanced using landscape management plans, as this will help to enhance environmental assets where they contribute to landscape and townscape quality. | In addition, National Grid is proposing a number of Environmental Areas along the Project, as described in the **Biodiversity Net Gain Report [APP-299], and the LEMP [AS-046]** which will contribute to enhancement of the landscape. |
| 5.10.25 | In considering visual effects it may be helpful for applicants to draw attention, in the supporting evidence to their applications, to any examples of existing permitted infrastructure they are aware of with a similar magnitude of impact on equally sensitive receptors. This may assist the Secretary of State in judging the weight they should give to the assessed visual impacts of the proposed development. | The landscape and visual assessment is presented in **ES Chapter 13: Landscape and Visual [APP-226].** The landscape baseline includes the existing 400 kV overhead line, the existing 132 kV overhead line, Norwich Main Substation and Bramford Substation. Embedded measures relevant to the landscape and visual assessment included choosing a corridor that allowed for paralleling with Bramford to Twinstead 400kV overhead line at west of Ipswich, and the existing 132 kV overhead line at north of Flowton and north of Mellis, where the existing 132 kV overhead lines would be undergrounded, to limit the magnitude of change from the Project. As such, the existing 132 kV overhead line is considered as forming part of the baseline and provides an example of existing permitted infrastructure with a similar magnitude of impact. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | **Mitigation** | |
| 5.10.27 | Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within its development site and wider setting. The careful consideration of colours and materials will support the delivery of a well-designed scheme, as will sympathetic landscaping and management of its immediate surroundings. | National Grid have sought to minimise adverse visual effects through the good design initiatives set out in response to 4.7.6 which sets out National Grid's approach to good design and demonstrates how National Grid has responded to the physical, environmental and socio-economic context of the overhead line route and CSE compound and substation locations.<br>National Grid has sought to identify locations for the substations and CSE compounds which are able to take advantage of screening which is provided by existing tree belts and woodland areas. The land around National Grid permanent assets, where there is sufficient space, have been defined as Environmental Areas. These areas will provide landscape and visual screening benefits, as well as offering ecological value. |
| 5.10.28 | Depending on the topography of the surrounding terrain and areas of population it may be appropriate to undertake landscaping off site. For example, filling in gaps in existing tree and hedge lines may mitigate the impact when viewed from a more distant vista. | Planting proposals are set out in the **Outline LEMP [AS-046]** which will be secured through Requirement 4 of Schedule 3 of the **Draft DCO [APP-056].**<br>Any loss of Habitat of Principal Importance would be lost on a temporary basis and would be reinstated in line with the habitat reinstatement principles set out in Chapter 9 of the **Outline LEMP [AS-046]**.<br>Mitigation for the permanent loss of habitat would be delivered through the creation / enhancement of habitat associated with achieving BNG for the Project. Within the Order Limits six areas of land (defined as Environmental Areas) are proposed around the Project's permanent assets, where there is sufficient space. To ensure the target is reached, any additional creation / enhancement would be delivered outside of the Order Limits, as identified in the **Biodiversity Net Gain Report [APP-299].** |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | National Grid has sought to identify locations for the substations and CSE compounds which are able to take advantage of screening which is provided by existing tree belts and woodland areas. The land around National Grid permanent assets, where there is sufficient space, have been defined as Environmental Areas. These areas will provide landscape and visual screening benefits, as well as offering ecological value. The following sites have currently been identified as Environmental Areas:<br>• Land around Norwich Main Substation (areas not included in the Norwich Main Substation Planning application)<br>• Land around Norwich Main Substation (areas not included in the Norwich Main Substation Extension Planning application)<br>• Land around EACN Substation<br>• Land around Tilbury North Substation and Tilbury North (Warley Side) and Tilbury North (Tilbury Side) CSE Compounds (with Lower Thames Crossing)<br>• Land around Tilbury North Substation and Tilbury North (Warley Side) and Tilbury North (Tilbury Side) CSE Compounds (without Lower Thames Crossing)<br>• Land around Wenham Grove CSE Compound<br>• Land around Great Horkesley (EACN Side) CSE Compound<br>• Land around Great Horkesley (Tilbury Side) CSE Compound<br>• Land around Fairstead (EACN Side) and Fairstead (Tilbury Side) CSE Compounds.<br>Details of the **Environmental Areas are outlined in the Outline LEMP [AS-046]** and **Appendix D: Outline** |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | **Landscape Proposals of the Outline LEMP [APP-325].** This will be secured through Requirement 4 of Schedule 3 of the **Draft DCO [APP-056]**. |
| | **Secretary of State decision making** | |
| 5.10.29 | The Secretary of State should take into consideration the level of detailed design which the applicant has provided and is secured in the Development Consent Order, and the extent to which design details are subject to future approvals. | The design of the infrastructure will be substantially dictated by the equipment they contain and the function that they need to provide. However, the designs will also be in accordance with the designs presented in the application for development consent and the embedded measures identified in the **Outline CoCP [APP-300] and Outline LEMP [AS-046].**<br>The detailed designs will be undertaken by a competent contractor with knowledge of designing high voltage transmission lines and will be supported by environmental specialists including landscape architects and ecologists.<br>National Grid considers that the extensive controls already in place in respect of the design of the Project negate the need for a further Requirement requiring the authorised development to be carried out in general accordance with the Design and Layout Plans and the embedded measures secured within the Management Plans. |
| 5.10.30 | The Secretary of State should be satisfied that local authorities will have sufficient design content secured to ensure future consenting will meet landscape, visual and good design objectives. | See response to 4.7.6 and5.10.29. |
| 5.10.32 | When considering applications for development within National Parks, the Broads and ~~Areas of Outstanding Natural Beauty~~National Landscapes the conservation and enhancement of the ~~natural~~landscape and scenic beauty should be given ~~substantial~~great weight by the Secretary of State in deciding on applications for development consent in these areas. The Secretary of State may grant | Paragraphs 4.2.17 and 5.10.32 in NPS EN-1 confirm that the Secretary of State many grant development consent in nationally designated landscapes in exceptional circumstances. This includes demonstrating that the development will be in the public interest, along with other |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | development consent in these areas in exceptional circumstances. Such development should be demonstrated to be in the public interest and consideration of such applications should include an assessment of:<br>• ~~the~~The need for the development, including in terms of national considerations, and the impact of consenting or not consenting it upon the local economy;<br>• ~~the~~The cost of, and scope for, developing all or part of the development elsewhere outside the designated area or meeting the need for it in some other way, taking account of the policy on alternatives set out in Section 4.3; and<br>• ~~any~~Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. | matters listed below. The Project meets the tests set out in Paragraph 5.10.32, as follows:<br>The need for the development as described in the **Strategic Options Backcheck and Review [APP-355]** and **Planning Statement [APP-085]** explains that The UK Government policy requires significant reinforcement of the transmission system to facilitate the connection of renewable energy sources to transport electricity to where it is used.<br>The British Energy Security Strategy sets targets for the connection of up to 50GW of offshore wind by 2030s as a key part of a strategy for secure, clean and affordable British energy for the long term.<br>Without reinforcement, the capacity of the East Anglia and South East existing network is insufficient to accommodate the connection of the proposed new power sources. Therefore, reinforcement of the network is required.<br>The cost of, and scope for, developing elsewhere outside the designated area or meeting the need for it in some other way is set out in **Strategic Options Backcheck and Review [APP-355]**. **ES Chapter 3: Alternatives [APP-127]** documents the decision taken at the Strategic Proposal stage to route through the Dedham Vale National Landscape with underground cables. This could be approximately half the length of a route that avoids the Dedham Vale National Landscape.<br>In assessing route corridors through the National Landscape, National Grid preferred option was selected due to its greater distance from particularly highly valued parts of the Dedham Vale National Landscape, less potential for adverse effects on the historic environment and less potential for adverse effects on the historic environment and as it presents lower risk of Likely |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | Significant Effects on the internationally designated sites (Stour and Orwell Estuaries SPA and supporting Cattawade Marshes SSSI) and their qualifying features compared to other options through the National Landscape.<br><br>Undergrounding and careful consideration of routeing and siting through the National Landscape has been adopted as an approach to reduce permanent significant effect on the environment, the landscape and recreational opportunities within the National Landscape. Although the Project would be underground within Dedham Vale National Landscape, construction would have direct impacts. The assessment of effects on special qualities within Dedham Vale National Landscape, as set out in **Appendix 13.5: National Landscape Assessment Study [APP-235]**. The National Landscape Assessment Study concludes that effects on the special qualities of Dedham Vale National Landscape would reduce to minor and not significant (adverse) during operation once the underground cables are covered over and land use and landcover reinstated as far as possible.<br><br>On the basis of the above, exceptional circumstances have been demonstrated to justify the proposed development in the Dedham Vale National Landscape in accordance with paragraphs 4.2.17 and 5.10.32 of NPS EN-1. |
| 5.10.33 | For development proposals located within designated landscapes the Secretary of State should be satisfied that measures which seek to further purposes of the designation are sufficient, appropriate, reasonable and proportionate to the type and scale of the development. The Secretary of State should ensure that any projects consented in these designated areas should be carried out to high environmental standards, including through the application of appropriate requirements where necessary. | See response to 5.10.20 and 4.2.15-4.2.17 (inclusive). |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 5.10.34 | The duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas, which may have impacts within them. ~~In these locations,~~The aim should be to avoid harming the purposes of designation or to minimise adverse effects on the designation. Such projects should be designed sensitively given the various siting, operational, and other relevant constraints. ~~The~~ The fact that a proposed project will be visible from within a designated area should not in itself be a reason for the Secretary of State ~~should be satisfied that measures which seek to further the purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development~~to refuse consent. | National Grid undertook a Setting Study, which is presented in **ES Appendix 13.5: National Landscape Assessment Study, Annex A: Dedham Vale National Landscape Setting Study [APP-235]**. This defines the setting of the National Landscape in relation to the Project and has considered views in and out of the National Landscape as part of defining the setting. The Setting Study helped inform the design of the Project, including the extent of undergrounding.<br><br>In respect to the Statutory Duty, **Section 245 (Protected landscapes), of the Levelling-Up and Regeneration Act 2023 National Grid has produced National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]**.<br><br>In line with the Defra guidance (Defra, 2024) '*Appropriate, reasonable and proportionate steps*' are being considered and explored which would seek to further the statutory purposes of the National Landscape. An initial high level scoping exercise was undertaken to identify potential measures with specific consideration given to the special qualities of the Dedham Vale National Landscape and the Dedham Vale AONB and Stour Valley Project Area Management Plan 2021-2026. This scoping exercise included considering and identifying:<br><br>• existing projects being delivered within the National Landscape which could be supported,<br>• potential new projects which could be delivered in the National Landscape, and/or<br>• financial contributions to a third party to deliver existing or new projects<br><br>The potential measures and approach to the protected landscape duty being taken by National Grid has been |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | discussed with stakeholders to seek their feedback. Engagement is being undertaken with the Dedham Vale National Landscape Partnership and relevant local authorities. This engagement is ongoing.<br>National Grid will continue to engage and work with stakeholders to seek agreement on the proposed package of measures to fulfil the duty to seek to further the statutory purpose of the Dedham Vale National Landscape.<br>A working draft document setting out the proposed package of measures and the key principles of the fund has been shared with the DVNL Partnership for their feedback. The DVNL Partnership has stated that they are broadly content subject to some final specific areas to agree. Natural England and the relevant local authorities have also been provided the document for their information. A copy of the working draft has been provided in **Appendix A of National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]**.<br>The package of measures is anticipated to be secured by a legal agreement. National Grid will work with the DVNL Partnership to agree the Heads of Terms for such a legal agreement, seeking to finalise the agreement prior to the close of the examination.<br>A further update will be provided during the Examination as discussions with the stakeholders' progress |
| 5.10.35 | The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project. | **ES Chapter 13: Landscape and Visual [APP-226]** presents the landscape and visual assessment including the effects of construction and operation of the Project on landscape receptors. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 5.10.36 | In reaching a judgement, the Secretary of State should consider whether any adverse impact is temporary, such as during construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the Secretary of State considers reasonable. | The landscape and visual amenity assessments summarised in **ES Chapter 13: Landscape and Visual [APP-226]** indicate that the construction phases would result in significant negative landscape and visual amenity effects. These significant effects are related to the introduction of construction activity and equipment, including the loss of some landscape features including farmland and field boundary vegetation. At Year 15 of operation, following the maturation of mitigation planting within Environmental Areas, the assessment concludes that significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure Projects, as set out in Paragraphs 5.10.5 and 5.10.13 of NPS EN-1. |
| 5.10.37 | The Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by appropriate mitigation. | The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. The **Design Development Report [APP-122]** provides an explanation of the main changes in the route alignment and technology following the review and consideration of feedback received to the 2024 statutory consultation and to the targeted statutory and non-statutory consultations held in 2025. A **Design and Access Statement [APP-353]** has also been produced sets out a summary of National Grid's approach to good design and demonstrates how National Grid has responded to the physical, environmental and socio-economic context of the overhead line route and CSE compound and substation locations and responded to consultation to define the Project. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | The Design Development Report and Design and Access Statement should be read alongside both **ES Chapter 3: Alternatives [APP-127]**, which documents the key environmental factors in consideration of the main alternatives, and the **Planning Statement [APP-085],** which explains how planning policy, as well as the requirements of the Electricity Act and the principles of the Holford and Horlock Rules, have influenced the optioneering and design evolution process. The latter demonstrating how such policy and legislative objectives have been embedded into the design of the Project.<br><br>The landscape and visual effects of the Project are described in **ES Chapter 13: Landscape and Visual [APP-226]** along with the proposed mitigation required to reduce any significant effects.<br><br>Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features as far as reasonably practicable. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse residual landscape and visual effects.<br><br>Embedded mitigation measures relevant to landscape and visual amenity include:<br><br>Sensitive routeing and siting of the alignment and Order Limits - as far as practicable effects on identified environmental (including landscape and visual, ecology and heritage assets) and socio-economics receptors have been avoided and reduced. **ES Chapter 3: Alternatives [APP-127]** summarises the Project routeing and site selection process and consideration of alternatives.<br><br>Undergrounding is proposed in four locations, including through the Dedham Vale National Landscape and part of |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | its setting. The Dedham Vale National Landscape is a nationally important and designated landscape. With the proposed underground cable, the effects on views and setting will be reduced.<br><br>Prior to the commencement of construction works for the Project, several existing overhead and underground third-party services would need to be diverted, removed, undergrounded, or protected. The Project would follow the route of existing 132 kV overhead lines north of Flowton and north of Mellis, where the existing 132 kV overhead lines would be undergrounded. This would help to reduce landscape and visual effects.<br><br>The Project allows for the use of full line tension gantries at CSE compounds and substations (where design allows). The use of full tension gantries removes the need for a bulkier terminal pylon adjacent to the CSE compound which would reduce visual clutter and therefore help to reduce landscape and visual effects.<br><br>The Project allows for landscape planting around CSE compounds, the new EACN Substation, south of the new Tilbury North Substation and the existing Norwich Main Substation and its extension. These are presented as 'Environmental Areas' on **ES Figure 4.1: Proposed Project Design [APP-133]** and **ES Figure 4.2: Proposed Project Design – Permanent Features [APP-134]**. Further details including landscape plans and planting schedules are provided in the **Outline LEMP [AS-046].**<br><br>Replacement planting would be undertaken at the earliest opportunity given the right planting season to mitigate, where practicable, vegetation removed during construction.<br><br>National Grid have considered the proposed materials and colour palette for the CSE compounds and new substation / substation extension, including buildings, security fencing, |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | equipment, and surfacing to be sensitive to the environment they are located in, where practicable. Further information is included in the **Design Approach for Site Specific Infrastructure [APP-354]**. |
| 5.10.38 | The Secretary of State should consider whether requirements to the consent are needed requiring the incorporation of particular design details that are in keeping with the statutory and technical requirements for landscape and visual impacts. | The measures presented in the **Outline LEMP [AS-046]** will be secured by requirements of Schedule 3 in the **Draft DCO [APP-056]**. |
| **5.11** | **Land Use, Including Open Space, Green Infrastructure, and Green Belt** | |
| 5.11.1 | An energy infrastructure project will have a direct effect on the existing use of the proposed site and may have indirect effects on the use, or planned use, of land in the vicinity for other types of development. Given the likely locations of energy infrastructure projects there may be particular effects on open space including green and blue infrastructure. | Noted. |
| 5.11.3 | Although the re-use of previously developed land for new development can make a major contribution to sustainable development by reducing the amount of countryside and undeveloped greenfield land that needs to be used, it may not be possible for many forms of energy infrastructure. | Noted. |
| 5.11.4 | Development of land will affect soil resources, including physical loss of and damage to soil resources, through land contamination and structural damage. Indirect impacts may also arise from changes in the local water regime, organic matter content, soil biodiversity and soil process. | Noted. |
| 5.11.5 | Where pre-existing land contamination is being considered within a development, the objective is to ensure that the site is suitable for its intended use. Risks would require | Noted. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | consideration in accordance with the contaminated land statutory guidance as a minimum. | |
| 5.11.6 | The government's policy is to ensure there is adequate provision of high- quality open space and sports and recreation facilities to meet the needs of local communities. Connecting people with open spaces, sports and recreational facilities all help to underpin people's quality of life and have a vital role to play in promoting healthy living. | Noted. |
| 5.11.7 | Green and blue infrastructure can also enable developments to provide positive environmental, social, health and economic benefits. Green infrastructure includes green space such as parks and woodlands but also other environmental features such as street trees, hedgerows and green walls and roofs. It also includes blue infrastructure such as canals, rivers, streams, ponds, lakes and their borders. Well designed and managed green and blue infrastructure provides multiple benefits at a range of scales. It can contribute to biodiversity recovery, sequester carbon, absorb surface water, cleanse pollutants, absorb noise and reduce high temperatures. The Green Infrastructure Framework – Principles and Standards for England can be used to consider green infrastructure in development and plan for good quality and targeted creation or improvement. | The **Biodiversity Net Gain Report [APP-299]** sets out the proposals to improve local environmental conditions with regards to landscape and biodiversity improvements. Environmental Areas will be created around the new substations, substation extensions and the CSE compounds. The purpose of these areas is to deliver the statutory 10% biodiversity net gain enhancements but to also connect existing hedgerows and woodland, to improve green networks and enhance landscape character the **Outline LEMP [AS-046]** details how the Environmental Areas will be created and managed. |
| | **Applicant assessment** | |
| 5.11.8 | The ES (see Section 4.3) should identify existing and proposed land uses near the project, any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan. The assessment | Appendix A of the **Planning Statement [APP-085]** identifies those committed and emerging developments which interact with the Project Order Limits.<br>A Preliminary Contamination Risk Assessment (PRA) has been undertaken and presented in **ES Appendix 9.1: Baseline Information and Preliminary Contamination Risk Assessment [APP-182]** to assess potentially |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | should be proportionate to the scale of the preferred scheme and its likely impacts on such receptors. For developments on previously developed land, the applicant should ensure that they have considered the risk posed by land contamination and how it is proposed to address this. | contaminated land. The majority of the Order Limits and the 250 m Study Area appears to have remained as undeveloped/agricultural land since the late 1800s based on the earliest reviewed historical mapping, and supported by the other data sources reviewed and described above. In these areas, it is considered that there is a very low risk of significant sources of potential contamination. However, there are discrete areas within the Study Area that have a history of potentially contaminative land use or where the current land use is potentially contaminative. Where these areas are identified, readily available information relating to the Potential Sources of Contamination (PSC) has been gathered and a preliminary contamination risk assessment has been carried for each potential contamination source. |
| 5.11.9 | Applicants will need to consult the local community on their proposals to build on existing open space, sports or recreational buildings and land. Taking account of the consultations, applicants should consider providing new or additional open space including green and blue infrastructure, sport or recreation facilities, to substitute for any losses as a result of their proposal. When considering proposals for green infrastructure, ~~Applicant's~~applicants should refer to the Green Infrastructure Framework. | The **Consultation Report [APP-066]** provides a complete overview of the consultation and stakeholder engagement activities on the Project. Stakeholders have had an opportunity to comment on the emerging and detailed proposals as the Project design has developed. Where interactions with open space have been identified, National Grid have considered design changes to avoid or to minimise impacts. Where it has not been possible to avoid areas of open space, an assessment of the potential for loss has been included in Chapter 7 and **Appendix B Open Space Assessment of the Planning Statement [APP-085]**. |
| 5.11.10 | Applicants should use any up-to-date local authority assessment or, if there is none, provide an independent assessment to show whether the existing open space, sports and recreational buildings and land is surplus to requirements | Noted. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 5.11.11 | During any pre-application discussions with the applicant the LPA should identify any concerns it has about the impacts of the application on land use, having regard to the development plan and relevant applications and including, where relevant, whether it agrees with any independent assessment that the land is surplus to requirements. | Noted. |
| 5.11.12 – 5.11.13 | Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5).<br>Applicants should also identify any effects and seek to minimise impacts on soil health and protect and improve soil quality taking into account any mitigation measures proposed. | As reported in **ES Chapter 6: Agriculture and Soils [APP-138]** the potential presence of BMV land has been assessed through reference to published information and surveys of the areas permanently affected. The assessment sets out the total area of each land grade permanently affected and estimates the likely area of land at each grade. Measures have been outlined in the **Outline CoCP [APP-300] and Appendix C: Outline Soil Resource Plan of the Outline CoCP [APP-303]** to reduce the potential negative impacts on soils which are handled and disturbed, such as those to protect the quality of soils when they are stripped, stockpiled and restored and measures to reduce the disruption to agricultural activities. |
| 5.11.14 | Applicants are encouraged to develop and implement a Soil Management Plan which could help minimise potential land contamination. The sustainable reuse of soils needs to be carefully considered in line with good practice guidance where large quantities of soils are surplus to requirements or are affected by contamination. | **ES Chapter ES Chapter 6: Agriculture and Soils [APP-138]** considers the potential effects of the Project on agriculture and soil. Measures have been outlined in the **Outline CoCP [APP-300]** and the Outline Soil Resource Plan (Appendix C of the **Outline CoCP [APP-303]**) to reduce the potential negative impacts on soils which are handled and disturbed, such as those to protect the quality of soils when they are stripped, stockpiled and restored and measures to reduce the disruption to agricultural activities. |
| 5.11.15 | Developments should contribute to and enhance the natural and local environment by preventing new and existing developments from contributing to, being put at unacceptable risk from, or being adversely affected by, | Pollution management measures are set out in the **Outline CoCP [APP-300].**<br>The Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | unacceptable levels of soil, air, water or noise pollution or land instability. | unacceptable levels of soil, air, water or noise pollution or land instability. With the implementation of design measures, along with other control measures set out in the **Outline CoCP [APP-300]**, potential significant adverse effects of the Project during construction and operation (including maintenance) can be avoided. |
| 5.11.16 | Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans. | The assessment of potential impacts on air quality arising from the Project are assed in **ES Chapter 7: Air Quality [APP-147]**. The assessment of potential impacts on water quality arising from the Project are assed in **ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]**.<br>The assessment of Air Quality and Water Quality concludes that with the adoption of the good practice measures identified in the **Outline CoCP [APP-300]** there are no likely significant residual effects in relation to air quality or water quality. |
| 5.11.17 | Applicants should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. | **ES Chapter 9: Contaminated Land, Geology and Hydrogeology [APP-181]** considers land contamination based Preliminary Contamination Risk Assessment (PRA) (**ES Appendix 9.1: Baseline Information and Preliminary Contamination Risk Assessment [APP-182]**). The PRA has identified a generally 'very low/low risk' of significant existing contamination to be present within most of the Order Limits. Good practice measures GH02 (Foundation Works Risk Assessment) and GH08 (unexpected contamination) in the **Outline CoCP [APP-300]** are measures to reduce risks associated with contamination from the Project. |
| 5.11.18 | For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination, and where | **ES Appendix 9.1: Baseline Information and Preliminary Contamination Risk Assessment [APP-182]** describes the known areas where a risk of contamination has been |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | contamination is present, applicants should consider opportunities for remediation where possible. It is important to do this as early as possible as part of engagement with the relevant bodies before the official pre-application stage. | identified based on data provided from relevant bodies. This notes that the majority of the Order Limits and Study Area appears to have remained as "undeveloped" agricultural land and farm buildings since the earliest historical mapping reviewed, dating from the 1880s. In these areas it is considered that there is a very low risk of potential sources of significant existing contamination and therefore they are not considered further in the assessment. There are discrete areas within the Study Area that have a history of potentially contaminative land use or where the current land use is potentially contaminative. Where these areas are identified, readily available information relating to the Potential Sources of Contamination (PSC) has been gathered and a preliminary contamination risk assessment has been carried for each potential contamination source.<br>Based on the assessment, the following sites are assessed as presenting a potential moderate or above risk to sensitive receptors from existing contamination. The locations of these sites are presented on **ES Figure 9.6: Sites with a Moderate or Above Risk Classification [APP-191]**:<br>• PSC B1 – Rookery Farm, Lion Road – Historical landfill (Section B)<br>• PSC B5 – Bramford Substation (Section B)<br>• PSC C23 – Former RAF Raydon (Section C)<br>• PSC D1 – Former RAF Boxted (Section D)<br>The **Outline CoCP [APP-300]** sets out the measures that would be taken to deal with unexpected contamination identified during construction. |
| 5.11.19 | Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the | A Minerals Resource and Infrastructure Assessment has been undertaken to support the assessment undertaken in |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | long-term potential of the land use after any future decommissioning has taken place. | **ES Appendix 9.2 [APP-183]**. Large parts of the Order Limits are located within either a MSA or an MCA for sand and gravel and/or brick clay. The MSA and MCA both extend beyond the Order Limits, across substantial areas of Norfolk, Suffolk, and Greater Essex.<br>The Project will avoid and reduce effects on sensitive environmental features/receptors through its design process. The prior or incidental extraction of minerals would significantly increase the magnitude of environmental effects created by the Project and would lengthen the duration of construction works in sensitive areas, such as Dedham Vale National Landscape. The environmental impact associated with extracting the minerals is considered to be disproportionate to the value gained from extracting the minerals. |
| 5.11.20 | The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved except in very special circumstances. Applicants should therefore determine whether their proposal, or any part of it, is within an established Green Belt and if it is, whether their proposal may be inappropriate development within the meaning of Green Belt policy (see paragraph 5.11.36 below). | The **Planning Statement [APP-085]** includes an assessment to determine whether the Project may be inappropriate development within the meaning of Green Belt policy; and if the Project (or any part of it) may be inappropriate development, and demonstrating that very special circumstances exist, meaning that the harm by reason of inappropriateness and any other harm, is outweighed by other considerations.<br>To connect a new transmission connection into Tilbury Substation, it will be necessary to route through the Metropolitan Green Belt. National Grid has considered the effects on the Green Belt and all of the options connecting into Tilbury identified in the Corridor and Preliminary Routing and Siting Study (CPRSS) (National Grid, 2022) would result in new and upgraded infrastructure in the Green Belt.<br>The National Electricity Transmission System (NETS) transports energy from where it is generated to where it is |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | used, in homes, schools, hospitals, businesses, and factories. Electricity networks are an established feature in our landscapes, taking energy across open countryside to towns and cities where it is needed. To ensure the national electricity network can transport energy efficiently there are numerous electricity transmission connections crossing Green Belts. Many of these connections are by way of overhead lines. By their nature, electricity transmission infrastructure (overhead lines) within the Green Belt is inevitable due to the need to transport energy around the country and the need to avoid the most built-up areas around our towns and cities (Holford Rule Supplementary Note 1).<br><br>Some electricity infrastructure such as overhead lines, are considered to be engineering operations. By the nature of their design, and the sensitive siting, some of this infrastructure such as pylons and conductors may not be considered inappropriate development in the Green Belt as they do not conflict with Green Belt purposes and preserve openness. Although overhead lines may occupy long corridors within Green Belt, they involve little physical change to the land through which they pass and leave a large majority of the land beneath them free from development and therefore open.<br><br>Notwithstanding the above, the NPS EN-1 Paragraph 4.2.16 sets out that where a Project is CNP Infrastructure the Secretary of State will take as thea ~~a~~ starting point for decision making that that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. NPS EN-1 Paragraph 4.2.17 identifies that this assumption includes where development is within a |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | Green Belt and requires very special circumstances to justify development. The very special circumstances are identified within the Green Belt assessment contained within **Chapter 7 of the Planning Statement [APP-085].** |
| 5.11.21 | However, infilling or redevelopment of major developed sites in the Green Belt, if identified as such by the ~~local planning authority~~LPA, may be suitable for energy infrastructure. It may help to secure jobs and prosperity without further prejudicing the Green Belt or offer the opportunity for environmental improvement. Applicants should refer to relevant criteria on such developments in Green Belts. | Noted. |
| 5.11.22 | Moreover an applicant may be able to demonstrate that particular energy infrastructure, such as an underground pipeline, may be considered an “engineering operation” and regarded as not inappropriate in Green Belt. This is provided it preserves the openness of the Green Belt and does not conflict with the purposes of Green Belt designation. It may also be possible for an applicant to show that the physical characteristics of a proposed overhead line in a particular location would not have so harmful an impact as to conflict with the purposes of Green Belt designation, or with other protections of rural landscape. | The **Planning Statement [APP-085]** sets out that some electricity infrastructure such as overhead lines, are considered to be engineering operations. By the nature of their design, and the sensitive siting, some of this infrastructure such as pylons and conductors may not be considered inappropriate development in the Green Belt as they do not conflict with Green Belt purposes and preserve openness. Although overhead lines may occupy long corridors within Green Belt, they involve little physical change to the land through which they pass and leave a large majority of the land beneath them free from development and therefore open. |
| | **Mitigation** | |
| 5.11.23 | Although in the case of most energy infrastructure there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site (assuming that some of that use can still be retained post project construction) applicants should nevertheless seek to minimise these effects and the effects on existing or planned uses near the site by the application of good | The Project design is the result of an iterative process which will avoid, reduce and mitigate potential environmental effects. The **Design Development Report [APP-122] and ES Chapter 3: Alternatives [APP-127]** sets out how the Project has evolved from a concept, through strategic options, route corridors and indicative alignments to the Project presented within the application |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | design principles, including the layout of the project and the protection of soils during construction. | for development consent. **ES Chapter 4: Project Description [APP-130]** outlines how the Project has continued to avoid sensitive features through embedded measures within the design.<br>With regard to soil quality, proposed soil handling measures are set out in the **Outline CoCP [APP-300]**, and accompanying Outline Soil Resource Plan (**Appendix C of the Outline CoCP [APP-303]**) to reduce the potential negative impacts on soils which are handled and disturbed, such as those to protect the quality of soils when they are stripped, stockpiled and restored. Measures are also proposed to reduce the disruption to agricultural activities - for example, AS01 (Soil Management Measures) and AS05 (consultation with affected landowners), with all land required temporarily being returned to its preconstruction condition. The commitments in the Outline CoCP will be secured by Requirement 4 of Schedule 3 in the **Draft DCO [APP-056].** |
| 5.11.24 | Where green infrastructure is affected, the Secretary of State should consider imposing requirements to ensure the functionality and connectivity of the green infrastructure network is maintained in the vicinity of the development and that any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space including appropriate access to National Trails and other public rights of way and new coastal access routes. | In the case of Open Space specifically, the Project has taken a precautionary approach to the identification of potential open space. An assessment of the Project impacts on Open Space is presented in **Chapter 7 and Appendix B of the Planning Statement [APP-085].** In the case of green infrastructure assets, the Project will avoid as far as possible impacts to such green infrastructure assets, and the ES has determined that there are no significant long-term effects which are relevant in this respect.<br>As reported in **ES Chapter 15: Socio Economics and Recreation [APP-265]** there will be temporary closure and diversion resulting in over 500 m increase in journey length of eight Public Rights of Way (PRoW) (footpaths and bridleway) within Mid Suffolk, Colchester, Chelmsford and Brentwood Mitigation and management measures have |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | been devised to avoid and/or reduce the adverse effects on PRoW, which are set out in the **Outline Public Rights of Way Management Plan [APP-329]**. |
| 5.11.25 | The Secretary of State should also consider whether any adverse effect on green infrastructure and other forms of open space is adequately mitigated or compensated by means of any planning obligations, for example exchange land and provide for appropriate management and maintenance agreements. Any exchange land should be at least as good in terms of size, usefulness, attractiveness and quality, and accessibility. | See responses to 5.11.24 and 5.11.9 – 5.11.10. |
| 5.11.26 | Alternatively, where sections 131 and 132 of the Planning Act 2008 apply, replacement land provided under those sections will need to conform to the requirements of those sections | As reported in the **Special Category Land Report [APP-046]**<br>The Project is seeking powers for the compulsory acquisition of rights for both Common Land and Open Space Land.<br>In respect of both Common Land and Open Space Land, the rights sought will not impact the use or function of the common land or open space land when compared to its current use, and therefore the land is no less advantageous when burdened with these rights. |
| 5.11.27 | Existing trees and woodlands should be retained wherever possible. ~~In~~Under the ~~EIP,~~Environment Act 2021 the ~~Government committed~~government set a legally binding target to increase the tree canopy and woodland cover to 16.5% of total land area of England by 2050. The Environmental Improvement Plan recognises the need to protect and increase tree canopy and woodland covers. The applicant should assess the impacts on, and loss of, all trees and woodlands within the ~~Project~~project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the | The Project has been designed in a way which prioritises the retention of vegetation wherever practicable in accordance with good practice measures as outlined within the **Outline CoCP [APP-300]**. Owing to the size of the Project it has not been possible to completely avoid the loss of such natural features. The Outline LEMP [AS-046] sets out the principal measures that are required to help avoid, minimise, mitigate and compensate (where relevant) the impacts to vegetation.<br>**ES Appendix 13.6: Arboricultural Impact Assessment [APP-236]** identifies trees which may be affected by the |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long-term management and maintenance of newly planted trees should be secured. Where possible, projects should include the reuse of materials and use of sustainable materials such as timber, or recycled materials. | Project, and to provide information on their locations, quantity, and quality.<br>Retained trees will be protected during construction in accordance with the measures set out in BS 5837:2012 and BS 3998:2010 Tree work recommendations. Tree protection measures and good practice measures to be implemented during construction are set out in Section 7 of the **Outline LEMP [AS-046].** Where reasonably practicable, construction elements will be kept to the strict minimum required and micro-sited to avoid impacts on ecologically important features.<br>Temporary impact to habitats such as gaps in hedgerows to allow for construction access would be reinstated in line with the habitat reinstatement principles set out in Chapter 9 of the **Outline LEMP [AS-046]**.<br>Mitigation for the permanent loss of habitat would be delivered through the creation / enhancement of habitat associated with BNG for the Project. Within the Order Limits six areas of land (defined as Environmental Areas) are proposed around the Project's permanent assets, where there is sufficient space. To ensure the BNG target is reached, any additional creation / enhancement would be delivered outside of the Order Limits, as identified in the **Biodiversity Net Gain Report [APP-299].**<br>National Grid has committed to a 3:1 replacement for individual trees and trees within groups. The tree planting strategy will prioritise replanting within the Order Limits, offsite provision may however be required. Section 9.3 of the **Outline LEMP [AS-046]** sets out the strategy for reinstatement of woodland, small groups and individual trees.<br>The Main Works Contractor(s) will prepare a final Site Waste Management Plan (SWMP) which will be maintained |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | and monitored throughout the construction phase and oversee that any sub-contractor(s) adhere to the SWMP. The current Outline SWMP which comprises Appendix B of the **Outline CoCP [APP-302]** sets out, in an auditable manner, how waste will be reduced, reused, managed, and disposed of in accordance with the waste hierarchy. Dedicated areas have been identified on the construction plans to allow materials and wastes to be segregated at source, reducing the risk of damage or contamination. |
| 5.11.28 | Where a proposed development has an impact upon a Mineral Safeguarding Area (MSA), the Secretary of State should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources. | A Minerals Resource and Infrastructure Assessment has been undertaken to support the assessment undertaken and is presented in **ES Appendix 9.2 [APP-183]**. Large parts of the Order Limits are located within either a MSA or an MCA for sand and gravel and/or brick clay. The MSA and MCA both extend beyond the Order Limits, across substantial areas of Norfolk, Suffolk, and Greater Essex.<br>The Project has sought to avoid and reduce effects on sensitive environmental features/receptors through its design process. The prior or incidental extraction of minerals would significantly increase the magnitude of environmental effects created by the Project and would lengthen the duration of construction works in sensitive areas, such as Dedham Vale National Landscape. The environmental impact associated with extracting the minerals is considered to be disproportionate to the value gained from extracting the minerals |
| 5.11.29 | Where a project has a sterilising effect on land use (for example in some cases under transmission lines) there may be scope for this to be mitigated through, for example, using or incorporating the land for nature conservation or wildlife corridors or for parking and storage in employment areas. | No sterilising effects on land use are anticipated as a result of the Project. Unless otherwise identified for embedded or mitigation areas, landowners will still be able to farm beneath the overhead lines and above the underground cable. As reported in **ES Chapter 6: Agriculture and Soils [APP-138]** no likely significant effects on agricultural operations and viability are anticipated during operation. As |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | identified in **ES Appendix 9.2: Qualitative Minerals Resource and Infrastructure Assessment [APP-183]**, the quantity of mineral sterilised by the Project is considered to be insignificant in the context of the extensive occurrence of sand and gravel within the counties of Essex and Suffolk and the national need/significance of the Project.<br>The **Outline LEMP [AS-046]** sets out how land use would be reinstated following construction, including reinstatement of habitats. |
| 5.11.30 | Public Rights of way, National Trails, and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders. The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve or create new access. In considering revisions to an existing right of way, consideration should be given to the use, character, attractiveness, and convenience of the right of way. provisions in respect of these measures should be included in any grant of development consent. | A number of temporary diversions and crossing points are required for PRoW affected by the construction of the Project. The **Outline PRoW Management Plan [APP-329]** explains the details of the temporary short-term diversions and appropriate measures for the management of PRoW during the various stages of the Project. |
| 5.11.31 | The Secretary of State should consider whether the mitigation measures put forward by an applicant are acceptable and whether requirements or other provisions in respect of these measures should be included in any grant of development consent | In line with national policy requirements, the Project has been designed following the mitigation hierarchy. The mitigation hierarchy is a stepped process that helps development projects to address potentially adverse impacts on the environment<br>As described in **ES Chapter 5: EIA Approach and Method [APP-135]** the mitigation hierarchy has been applied to the Project throughout the iterative design process and with the following considered: |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | • Avoid – the first step of the mitigation hierarchy comprises mitigation measures taken to avoid creating impacts from the outset, such as careful spatial placement of infrastructure away from receptors, or timing construction sensitively to avoid their disturbance<br>• Prevent – these include measures to remove the impact at source or disrupt the impact pathway – such as adopting standard pollution prevention techniques in line with good practice to prevent watercourses becoming polluted<br>• Reduce – these are measures taken to reduce the duration, intensity and/or extent of impacts that cannot be completely avoided for example landscape planting around the permanent assets such as at the CSE compounds and the proposed new EACN Substation and Tilbury North Substation<br>• Offset (sometimes referred to as compensate) – where relevant and appropriate to the specific impact, these measures aim to compensate for any residual, adverse impacts after full implementation of the previous three steps of the mitigation hierarchy an example is individual tree replacement at a 3:1 ratio with some inside the Order Limits where space allows and some outside of the Order Limits.<br>The application of the Mitigation Hierarchy is reported across a number of documents which have been submitted as part of the application for development consent. The mitigation hierarchy has been applied throughout development of the Project as part of the iterative EIA process which has informed the routeing and siting process. The Project has been designed to avoid, reduce or mitigate potentially significant adverse residual effects. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | **Secretary of State decision making** | |
| 5.11.32 | The Secretary of State should not grant consent for development on existing open space, sports and recreational buildings and land unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be surplus to requirements or the Secretary of State determines that the benefits of the project (including need), outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities. | An Open Space Assessment is presented in Chapter 7 and Appendix B of the **Planning Statement [APP-085].** The Project has taken a precautionary approach to the identification of potential open space. |
| 5.11.34 | The Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. | As reported in **ES Chapter 6: Agriculture and Soils [APP-138]** the potential presence of BMV land has been assessed through reference to published information and surveys of the areas permanently affected. The assessment sets out the total area of each land grade permanently affected and estimates the likely area of land at each grade. Measures have been outlined in the **Outline CoCP [APP-300]** and **Appendix C: Outline Soil Resource Plan of the Outline CoCP [APP-303]** to reduce the potential negative impacts on soils which are handled and disturbed, such as those to protect the quality of soils when they are stripped, stockpiled and restored and measures to reduce the disruption to agricultural activities.<br>During construction there would be a loss of BMV land (ALC Grades 1, 2 and 3a) from agricultural productivity. It is calculated that 3461 ha of agricultural land would be temporarily removed from agricultural production during construction. Of this, 2923 ha (84.4%) are mapped as Grades 1, 2 and 3a and as such the temporary removal is |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | considered to have a temporary negative effect which would be significant.<br>During operation (and maintenance), there would be a permanent loss of areas of agricultural land required for permanent infrastructure. The assessment reported ES **Chapter 6: Agriculture and Soils [APP-138]** states this this permanent loss equates to approximately 172.7 hectares of Grade 1, Grade 2 and Grade 3a agricultural land (i.e., BMV land) would be taken out of agricultural production permanently.<br>The Project minimises impacts on BMV agricultural land as far as practicable and includes mitigation measures to reduce impacts on the soil resource. The permanent loss of BMV land is considered necessary on the basis that there is urgent need for CNP Infrastructure such as the Project. The routeing and siting selection process confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Project |
| 5.11.38 | In England, Local Green Spaces may be designated locally in Local Plans and Neighbourhood Plans. These enjoy the same protection as Green Belt in England and the Secretary of State should adopt a similar approach. | In line with national policy requirements, the Project has been designed following the mitigation hierarchy and has avoided impacts where possible through the routeing and siting process. Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features as far as reasonably practicable.<br>The Project does cross two area of local green spaces designated in the adopted Ardleigh Neighbourhood Plan. The local green space at Glebe Corner will be subject to undergrounding existing UKPN overhead line infrastructure. These works will result in a temporary impact on this local green space. The local green space at the fishing lake north of Colchester Road is oversailed by the Project. For |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | safety considerations this will prevent fishing activities. An assessment of this loss is reported in **Appendix B: Open Space Assessment in the Planning Statement [APP-085]**<br><br>The **Design Development Report [APP-122]** outlines the alternative alignments which were considered to avoid oversailing the area of local green space. Alternatives to avoid oversail of the water body, to allow continuation or intensification of angling were considered. These would necessitate multiple changes of direction, give routeing constraints and the presence of residential properties, whether passing to the east (residential properties within 200 m) or west (residential properties within around 100 m) of the water body. These multiple angle changes would reduce consistency with the Holford Rules and increase effects to multiple residential properties close to the alignment in this area. Due to the limited and informal level of angling activity and the additional environmental effects from the alternatives, retain the straighter 2023 preferred draft alignment and oversail the waterbody was preferred although recognising that this would terminate the informal angling arrangements.<br><br>Acknowledging that local green spaces enjoy the same protection as Green Belt in England; National Grid have stated that their position in the **Planning Statement [APP-085]** that overhead lines comprise an engineering operation and should be regarded as not inappropriate in the Green Belt. However, were this approach to be challenged it is considered that the Need Case for the Project presented in the **Strategic Options Backcheck and Review [APP-355]** demonstrates the very special circumstances for the Project. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
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| **5.12** | **Noise and Vibration** | |
| 5.12.2 | The ~~Government's~~government's policy on noise is set out in the Noise Policy Statement for England. It promotes good health and good quality of life through effective noise management. Similar considerations apply to vibration, which can also cause damage to buildings. In this section, in line with current legislation, references to "noise" below apply equally to the assessment of impacts of vibration. | **ES Chapter 2: Key Legislation and Planning Policy Context [APP-126]** sets out the key overarching policy relevant to the Project.<br>An assessment on the effects from noise is included within **ES Chapter 14: Noise and Vibration [APP-256]**. |
| | **Applicant assessment** | |
| 5.12.6 – 5.12.7 | Where noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment:<br>• ~~a~~A description of the noise generating aspects of the development proposal leading to noise impacts, including the identification of any distinctive tonal characteristics, if the noise is impulsive, whether the noise contains particular high or low frequency content or any temporal characteristics of the noise<br>• ~~identification~~Identification of noise sensitive receptors and noise sensitive areas that may be affected<br>• ~~the~~The characteristics of the existing noise environment<br>• ~~a~~A prediction of how the noise environment will change with the proposed development<br>– ~~in~~In the shorter term, such as during the construction period<br>– ~~in~~In the longer term, during the operating life of the infrastructure<br>– ~~at~~At particular times of the day, evening and night (and weekends) as appropriate, and at different times of year | Operational noise from overhead lines is scoped out of the ES, in accordance with the **Scoping Opinion [APP-297],** on the basis that a low noise conductor system is proposed. However, additional information regarding operational noise impacts from the overhead lines is provided for information in **ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) [APP-261]**.<br>**ES Chapter 14: Noise and Vibration [APP-256]** includes an assessment of the likely significant effects from noise and vibration from the Project, including those associated with potential working at night during the construction of the Project. The **Outline Code of Construction Practice [APP-300]** (Outline CoCP) sets out noise and vibration limits, monitoring protocols, and reporting requirements for all construction activities to minimise adverse impacts during the construction phase. The measures set out within **7.2 Outline CoCP [APP-300]** will be secured via Requirement 4(a) (Construction Management Plans) of **3.1 Draft DCO [APP-056]** within the final CoCP. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | • ~~an~~An assessment of the effect of predicted changes in the noise environment on any noise-sensitive receptors, including an assessment of any likely impact on health and quality of life / well-being where appropriate, particularly among those disadvantaged by other factors who are often disproportionately affected by noise-sensitive areas<br>• ~~if~~If likely to cause disturbance, an assessment of the effect of underwater or subterranean noise<br>• ~~all~~All reasonable steps taken to mitigate and minimise potential adverse effects on health and quality of life The nature and extent of the noise assessment should be proportionate to the likely noise impact. | |
| 5.12.8 | Applicants should consider the noise impact of ancillary activities associated with the development, such as increased road and rail traffic movements, or other forms of transportation. | **ES Chapter 14: Noise and Vibration [APP-256]** presents the assessment of the likely significant noise and vibration effects that could result from the construction of the Project. The Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects. Further information is also provided in **ES Appendix 14.2: Construction Traffic Noise Assessment [APP-258]**. |
| 5.12.9 | Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards and other guidance. Further information on assessment of particular noise sources may be contained in the technology specific NPSs. In particular, for renewables (EN-3) and electricity networks (EN-5) there is assessment guidance for specific features of those technologies. For the prediction, assessment and management of construction noise, reference should be made to any relevant British Standards264 and other guidance which also give examples of mitigation strategies. | Operational noise from overhead lines is scoped out of the ES, in accordance with the **Scoping Opinion [APP-297]**, on the basis that a low noise conductor system is proposed. However, additional information regarding operational noise impacts from the overhead lines is provided for information in **ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) [APP-261]**. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 5.12.10 | Some noise impacts will be controlled through environmental permits and parallel tracking is encouraged where noise impacts determined by an environmental permit interface with planning issues (i.e. physical design and location of development). The applicant should consult the EA and/or the SNCB, and other relevant bodies, such the MMO or NRW, as necessary, and in particular regarding assessment of noise on protected species or other wildlife. The results of any noise surveys and predictions may inform the ecological assessment. The seasonality of potentially affected species in nearby sites may also need to be considered. | **ES Chapter 14: Noise and Vibration [APP-256]** presents the assessment of the likely significant noise and vibration effects that could result from the construction of the Project. The Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects. The assessment concluded with the relevant standard mitigation measures and best practicable means (BPM) set out in **Appendix F: Outline Noise and Vibration Management Plan to the Outline CoCP [APP-306]** relating to noise and vibration the residual effect of construction noise will not be significant to all nearby NSRs during both daytime and nighttime periods. Further detailed construction noise and vibration assessments will be undertaken by the main works contractor(s) prior to commencing works.<br><br>Operational noise from overhead lines is scoped out of the ES, in accordance with the **Scoping Opinion [APP-297]**, on the basis that a low noise conductor system is proposed. However, additional information regarding operational noise impacts from the overhead lines provided for information in ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) **[APP-261]**. The effects of noise from the Project on ecological receptors are considered in **ES Chapter 8: Ecology and Biodiversity [AS-026]** using supporting data from **ES Chapter 14: Noise and Vibration [APP-256].** |
| 5.12.12 | Applicants should submit a detailed impact assessment and mitigation plan as part of any development plan, including the use of noise mitigation and noise abatement technologies during construction and operation. | **ES Chapter 14: Noise and Vibration [APP-256]** includes an assessment of the likely significant effects from noise and vibration from the Project, including those associated with potential working at night during the construction of the Project. The **Outline CoCP [APP-300]** contains a list of relevant standard mitigation measures and best practicable means (BPM) relating to Noise and Vibration which would |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | lead to negligible to small magnitude of impact of construction noise.<br>Operational noise from overhead lines is scoped out of the ES, in accordance with the **Scoping Opinion [APP-297]**, on the basis that a low noise conductor system is proposed. However, additional information regarding operational noise impacts from the overhead lines provided for information in **ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) [APP-261]**. |
| | **Mitigation** | |
| 5.12.13 | The Secretary of State should consider whether mitigation measures are needed both for operational and construction noise over and above any which may form part of the project application. In doing so the Secretary of State may wish to impose mitigation measures. Any such mitigation measures should take account of the NPPF or any successor to it and the Planning Practice Guidance on Noise. | **ES Chapter 14: Noise and Vibration [APP-256]** includes an assessment of the likely significant effects from noise and vibration from the Project.<br>The Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects in accordance with Paragraph 4.7.3 of NPS EN-1. With the implementation of design measures, along with other control measures, potential significant adverse effects of the Project at NSR during construction and operation (including maintenance) can be avoided.<br>The **Outline Code of Construction Practice [APP-300]** (Outline CoCP) sets out noise and vibration limits, monitoring protocols, and reporting requirements for all construction activities to minimise adverse impacts during the construction phase. The measures set out within **7.2 Outline CoCP [APP-300]** will be secured via Requirement 4(a) (Construction Management Plans) of **3.1 Draft DCO [APP-056]** within the final CoCP. The construction mitigation measures proposed are set out in commitment reference NV01 to NV07 in the **Outline CoCP [APP-300]**. |
| 5.12.14 | Mitigation measures may include one or more of the following:<br>• ~~engineering~~Engineering: reducing the noise generated at source and/or containing the noise generated;<br>• ~~lay~~Lay-out: where possible, optimising the distance between the source and noise sensitive receptors and/or incorporating good design to minimise noise transmission through the use of screening by natural or purpose-built barriers, or other buildings;<br>• ~~administrative~~Administrative: using planning conditions/obligations to restrict activities allowed on the site at certain times and/or specifying permissible noise limits/ noise levels, differentiating as appropriate | |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | between different times of day, such as evenings and late at night, and taking into account seasonality of wildlife in nearby designated sites; and<br>• ~~insulation~~Insulation: mitigating the impact on areas likely to be affected by noise including through noise insulation when the impact is on a building. | The Main Works Contractor(s) would conduct detailed construction noise assessments to determine whether there are likely to be any new or different significant adverse effects at noise and vibration sensitive receptors (NSRs) and therefore whether additional measures, including site-specific BPM, may be required. The Outline Noise and Vibration Management Plan (NVMP) (**Appendix F of the Outline CoCP [APP-306]**) would be updated into a Noise and Vibration Management Plan, incorporating the findings of their detailed assessment and associated site-specific mitigation. |
| 5.12.15 | The project should demonstrate good design through selection of the quietest or most acceptable cost-effective plant available; containment of noise within buildings wherever possible, taking into account any other adverse impacts that such containment might cause (e.g. on landscape and visual impacts; optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission). | Operational noise from overhead lines is scoped out of the ES, in accordance with the **Scoping Opinion [APP-297]**, on the basis that a low noise conductor system is proposed. However, information on noise from overhead lines is provided in **ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) [APP-261]**. **ES Chapter 14: Noise and Vibration [APP-256]** includes an assessment of the likely significant effects from noise and vibration from the Project, including those associated with potential working at night during the construction of the Project. The **Outline Code of Construction Practice [APP-300]** (Outline CoCP) sets out noise and vibration limits, monitoring protocols, and reporting requirements for all construction activities to minimise adverse impacts during the construction phase. The measures set out within **7.2 Outline CoCP [APP-300]** will be secured via Requirement 4(a) (Construction Management Plans) of **3.1 Draft DCO [APP-056]** within the final CoCP. |
| 5.12.16 | A development must be undertaken in accordance with statutory requirements for noise. Due regard must be given to the relevant sections of the Noise Policy Statement for | The assessment of noise and vibration effects describe in **ES Chapter 14: Noise and Vibration [APP-256]** has due |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | England, the NPPF, and the government's associated planning guidance on noise. In Wales the relevant policy will be PPW and the TANs, as well as the Welsh Government's Noise and Soundscape Action Plan. | regard for the relevant sections of the NPPF and the government's associated planning guidance. |
| | **Secretary of State decision making** | |
| 5.12.17 | The Secretary of State should not grant development consent unless they are satisfied that the proposals will meet the following aims, through the effective management and control of noise:<br>• ~~avoid~~Avoid significant adverse impacts on health and quality of life from noise;<br>• ~~mitigate~~Mitigate and minimise other adverse impacts on health and quality of life from noise; and<br>• ~~where~~Where possible, contribute to improvements to health and quality of life through the effective management and control of noise. | **ES Chapter 10: Health and Wellbeing [APP-192]** includes an assessment of the likely significant effects from noise and vibration referenced in **ES Chapter 14: Noise and Vibration [APP-256]** during the construction and operation of the Project.<br>This has identified that there would be no residual effects on health and quality of life from noise with the good practice measures and mitigation in place. |
| 5.12.18 | When preparing the Development Consent Order, the Secretary of State should consider including measurable requirements or specifying the mitigation measures to be put in place to ensure that noise levels do not exceed any limits specified in the development consent. These requirements or mitigation measures may apply to the construction, operation, and decommissioning of the energy infrastructure development | Operational noise from overhead lines is scoped out of the ES, in accordance with the **Scoping Opinion [APP-297]**, on the basis that a low noise conductor system is proposed. However, information on noise from overhead lines is provided in **ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) [APP-261]**. **ES Chapter 14: Noise and Vibration [APP-256]** includes an assessment of the likely significant effects from noise and vibration from the Project, including those associated with potential working at night during the construction of the Project. The **Outline Code of Construction Practice [APP-300]** (Outline CoCP) sets out noise and vibration limits, monitoring protocols, and reporting requirements for all construction activities to minimise adverse impacts during the construction phase. The measures set out within **7.2 Outline CoCP [APP-300]** will |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | be secured via Requirement 4(a) (Construction Management Plans) of **3.1** Draft DCO **[APP-056]** within the final CoCP. |
| **5.13** | **Socio-Economic Impacts** | |
| | **Applicant assessment** | |
| 5.13.2 | Where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts as part of the ES (see Section 4.3). | **ES Chapter 15: Socio-economics, Recreation and Tourism [APP-265]** includes an assessment of the Project effects on:<br>• Employment, economic activity and tourism economy during construction<br>• Disruption of access to community facilities during construction and operation (and maintenance). This excludes visual amenity, which is considered in **ES Chapter 13: Landscape and Visual [APP-226]**<br>• Disruption to businesses during construction and operation (and maintenance). This excludes potential effects on agricultural businesses, which are considered under **ES Chapter 6: Agriculture and Soils [APP-138]**<br>• Disruption to tourism, recreational assets and open space during construction and operation (and maintenance)<br>• Pressures on local visitor accommodation during construction<br>• Severance and 'sterilisation' of land in the context of its potential for future development during construction and operation (and maintenance)<br>This chapter should be read in conjunction with the following report:<br>• **ES Appendix 15.1: Built and Other Assets within the 3 km Study Area [APP-266]** |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 5.13.3 | The applicant is strongly encouraged to engage with relevant local authorities during early stages of project development so that the applicant can gain a better understanding of local or regional issues and opportunities. | The socio-economic, recreation and tourism technical discipline have engaged in a series of thematic meetings with the relevant local authorities. The thematic meetings provided an opportunity for the local planning authorities to raise questions and concerns as well as discussing important points of local context to inform the assessment.<br>Further details regarding consultation are detailed in Section 15.3 of **ES Chapter 15: Socio-economics, Recreation and Tourism [APP-265]**. |
| 5.13.4 | The applicant's assessment should consider all relevant socio-economic impacts, which may include:<br>• ~~the~~The creation of jobs and training opportunities. Applicants may wish to provide information on the sustainability of the jobs created, including where they will help to develop the skills needed for the UK's transition to Net Zero;<br>• ~~the~~The contribution to the development of low-carbon industries at the local and regional level as well as nationally;<br>• ~~the~~The provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities;<br>• ~~any~~Any indirect beneficial impacts for the region hosting the infrastructure, in particular in relation to use of local support services and supply chains;<br>• ~~effects~~Effects (positive and negative) on tourism and other users of the area impacted;<br>• ~~the~~The impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure. This could change the local population dynamics and | **ES Chapter 15: Socio-economics, Recreation and Tourism [APP-265]** includes an assessment of the Project effects on socio-economics, recreation and tourism that could arise from the construction and operation (including maintenance) of the Project.<br>The majority of construction activities would require trained specialists who are qualified to work on high voltage electricity lines. These are typically sourced from National Grid's existing pool of approved contractors. However, from experience with other National Grid Projects, it is likely that a minimum of 10% of the workforce would be sourced from the local labour market. These could, for example, have less specialist roles such as security workers and delivery drivers. This level of local employment, based on the assumption of approximately 4,800 construction employment throughout the four-year construction period, could result in a total job demand of approximately 480 jobs local jobs locally.<br>Tourism is a key contributor to the local economy, providing employment for the local workforce. During the construction phase, there is potential for temporary impacts arising from changes in air quality (e.g., dust), noise levels, visual amenity, and traffic congestion, which may influence tourists' perception of the area. Due to the linear nature of |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | could alter the demand for services and facilities in the settlements nearest to the construction work (including community facilities and physical infrastructure such as energy, water, transport and waste). There could also be effects on social cohesion depending on how populations and service provision change as a result of the development; and<br>• ~~cumulative~~Cumulative effects - if development consent were to be granted to for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region | the Project, these potential impacts are expected to be short-term in most locations and confined to the construction phase. The construction good practices and mitigation measures in the **Outline CoCP [APP-300] and Outline Construction Traffic Management Plan (CTMP) [APP-309]** are anticipated to mitigate these potential effects. The measures in both of these management plans will be secured by Requirement 4 of Schedule 3 of the **Draft DCO [APP-056].**<br>With these measures implemented, the potential impact on the tourism economy is expected to be low. Considering the medium sensitivity of the local economy, the potential effects on the tourism economy within the Wider Study Area during construction are assessed as temporary, short-term, negligible adverse and not significant.<br>The inter-project cumulative assessment presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** included a 'cut-off date' of 1 April 2025 to confirm the long list of cumulative developments to be assessed. However, since 1 April the Applicant has been undertaking monthly reviews of planning registers and Local Planning Authority websites and will continue to do so during the Examination period, to check whether there are any new relevant developments / allocations. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement, these would be published into Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate). |
| 5.13.5 | Applicants should describe the existing socio-economic conditions in the areas surrounding the proposed development and should also refer to how the | **ES Chapter 15: Socio-economics, Recreation and Tourism [APP-265]** presents the existing socio-economic conditions in the Local, 3 km and Wider Study Areas |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | development's socio-economic impacts correlate with local planning policies. | surrounding the Project. Relevant planning policy is identified in Section 15.2. |
| 5.13.6 | Socio-economic impacts may be linked to other impacts, for example visual impacts considered in Section 5.10 but may also have an impact on tourism and local businesses. Applicants are encouraged, where possible, to demonstrate that local suppliers have been considered in any supply chain. | **ES Chapter 15: Socio-economics, Recreation and Tourism [APP-265]** includes an assessment of the Project effects on socio-economics, recreation and tourism that could arise from the construction and operation (including maintenance) of the Project. This includes an assessment of impacts on the integrity of tourist attractions and business premises, the impact on jobs in the supply chain during the construction phase, and the impact of changing influx of construction workers on the availability of local accommodation facilities. |
| 5.13.7 | Applicants should consider developing accommodation strategies where appropriate, especially during construction and decommissioning phases, that would include the need to provide temporary accommodation for construction workers if required. | **ES Chapter 15: Socio-economics, Recreation and Tourism [APP-265]** includes an assessment of the Project effects on socio-economics, recreation and tourism that could arise from the construction and operation (including maintenance) of the Project.<br>During construction and decommissioning there would be sufficient capacity to accommodate the workforce for the Project. |
| | **Mitigation** | |
| 5.13.8 | The Secretary of State should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development. For example, high quality design can improve the visual and environmental experience for visitors and the local community alike. | The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce socio-economic, recreation and tourism impacts and effects through the process of design development. This has included:<br>• Sensitive routing and siting of infrastructure and temporary works to avoid or reduce impacts on socio-economic, recreation and tourism receptors |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | • The Project will be constructed in compliance with the required Environmental Control Plans (ECPs). Those anticipated to be required, at this stage include:<br>– **Appendix B Outline Construction Worker Travel Plan [APP-311]** of the **Outline Construction Traffic Management Plan [APP-309]**<br>– S01: Provision of training to construction workers, particularly in relation to working hours and the management of emissions (dust, noise, vibration, etc).<br>– S02: PRoWs crossing the working areas will be managed in discussion with the relevant local authorities and potential temporary closures and diversions applied, where required. Temporary closures and diversions will be kept to a temporal minimum, and that, where practicable alternative routes are maintained. Access disruption would be reduced while construction activities occur where practicable. Any required temporary diversions will be clearly marked at both ends with signage explaining the diversion, the duration of the diversion and a contact number for any concerns. Management of PRoW during construction is detailed in the **Outline PRoW Management Plan [APP-329]**.<br>– S05: National Grid would seek to work with event organisers to minimise disruption to events, such as the Little Bromley 10 km Run, Corbeau Seats Rally, Tour de Tendring, and Ford Ride London-Essex 100. Given the uncertainty surrounding whether the events would proceed as planned, event organisers are encouraged to contact National Grid in advance |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | of their event to ensure effective coordination and support.<br>Further control and management measures have also been incorporated into the **Outline CoCP [APP-300]** to mitigate any adverse socio-economic, recreation and tourism effects. The Outline CoCP will be secured by Requirement 4 of Schedule 3 of the **Draft DCO [APP-056].** |
| | **Secretary of State decision making** | |
| 5.13.9 | The Secretary of State should have regard to the potential socio-economic impacts of new energy infrastructure identified by the applicant and from any other sources that the Secretary of State considers to be both relevant and important to its decision. | **ES Chapter 15: Socio-economics, Recreation and Tourism [APP-265]** includes an assessment of the Project effects on socio-economics, recreation and tourism that could arise from the construction and operation (including maintenance) of the Project.<br>The majority of construction activities would require trained specialists who are qualified to work on high voltage electricity lines. These are typically sourced from National Grid's existing pool of approved contractors. However, from experience with other National Grid projects, it is likely that a minimum of 10% of the workforce would be sourced from the local labour market. These could, for example, have less specialist roles such as security workers and delivery drivers. This level of local employment, based on the assumption of approximately 4,800 construction employment throughout the four-year construction period, could result in a total job demand of approximately 480 jobs local jobs locally.<br>Tourism is a contributor to the local economy, providing employment for the local workforce. During the construction phase, there is potential for temporary impacts arising from changes in air quality (e.g., dust), noise levels, visual amenity, and traffic congestion, which may influence tourists' perception of the area. Due to the linear nature of |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | the Project, these potential impacts are expected to be short-term in most locations and confined to the construction phase. The construction good practices and mitigation measures in the **Outline CoCP [APP-300] and Outline CTMP [APP-309]** are anticipated to mitigate these potential effects.<br>With these measures implemented, the potential impact on the tourism economy is expected to be low. Considering the medium sensitivity of the local economy, the potential effects on the tourism economy within the Wider Study Area during construction are assessed as temporary, short-term, negligible adverse and not significant. |
| 5.13.10 | The Secretary of State may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence (particularly in view of the need for energy infrastructure as set out in this NPS). | Noted. Assertion of socio-economic impacts are supported by evidence presented in **ES Chapter 15: Socio-economics, Recreation and Tourism [APP-265]**. |
| 5.13.11 and 5.13.12 | The Secretary of State should consider any relevant positive provisions the applicant has made or is proposing to make to mitigate impacts (for example through planning obligations) and any legacy benefits that may arise as well as any options for phasing development in relation to the socio-economic impacts.<br>The Secretary of State may wish to include a requirement that specifies the approval by the local authority of an employment and skills plan detailing arrangements to promote local employment and skills development opportunities, including apprenticeships, education, engagement with local schools and colleges and training programmes to be enacted. | National Grid promotes the use of local supply and small/medium enterprises through main contractors by embedded targets within its framework contracts. National Grid will continue to work with relevant planning authorities and business leaders at a national, regional and local level to identify opportunities to invest in employment networks, including looking for opportunities to work with local businesses.<br>The Applicant recognises the importance of skills development and workforce planning and has already given detailed consideration to the scale and nature of employment likely to arise from the Project. Due to the characteristics of the works, the maximum peak onsite construction workforce attributable to local labour is anticipated to be approximately 172 Full Time Equivalent (FTE) roles, with a total local job demand of approximately 480 roles across the four-year construction period. This |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | level of employment is modest in scale and is not considered significant when compared with employment demand in other sectors or large-scale regeneration schemes.<br>The Applicant is committed to supporting skills development and workforce planning at both local and regional levels, beyond the scope of this individual Project. This includes:<br>• Working with local suppliers and supporting forums, such as Chambers of Commerce<br>• Contributing to a coordinated regional approach to electricity industry jobs and skills planning<br>• Engaging with Local Authorities to understand local priorities and opportunities around skills and employment.<br>These commitments form part of the Applicant's wider approach to community benefits and legacy and are broader than, and separate from, the DCO process. The delivery of these initiatives will be taken forward through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with established guidance. |
| **5.14** | **Traffic and Transport** | |
| | **Applicant assessment** | |
| 5.14.5 – 5.14.6 | If a project is likely to have significant transport implications, the applicant's ES (see Section 4.3) should include a vision for transport ~~appraisal.~~ and an assessment of potential transport impacts.<br>The DfT's Transport Analysis Guidance (TAG)~~267~~ and Welsh Governments ~~WelTAG268~~WelTAG236 provides | A **Transport Assessment [APP-333]** has been produced for the Project. The Transport Assessment has been developed in line with DLUHC guidance (Travel Plans, Transport Assessments and Statements) and relevant TAG (formerly WebTAG) principles. The Traffic and Transport assessment reported in **ES Chapter 16: Traffic and Transport [APP-271]** is developed using a methodology |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | guidance on modelling and assessing the impacts of transport schemes. | based on both DMRB and GEART guidance. Both National Highways and the relevant highway authorities have been consulted on the scope of the Transport Assessment (see Appendix 16.1: Engagement Undertaken Relevant to Traffic and Transport of the **ES Chapter 16: Traffic and Transport [APP-272]** and the ES traffic and transport assessment, and their comments have informed both assessments. |
| 5.14.~~6~~7 | National Highways and Highways Authorities are statutory consultees on NSIP applications including energy infrastructure where it is expected to affect the strategic road network and / or have an impact on the local road network. and applicants should consult with National Highways and Highways Authorities as appropriate on the assessment, including any reasonable future tested scenarios and mitigation to inform the application to be submitted. | National Grid has been engaging with the Local Highways Authorities and National Highways and the progress with each is reported in the respective Statement of Common Ground (SoCG). The relevant SoCGs are listed below:<br>• **National Highways SoCG [APP-108]**<br>• **Norfolk County Council SoCG [APP-089]**<br>• **Suffolk County Council SoCG [APP-090]**<br>• **Essex County Council SoCG [APP-091]**<br>• **Thurrock Council SoCG [APP-092]**<br>• The above SoCGs seek to confirm the stakeholders' position with regard to the scenarios adopted for junction capacity, modelling and construction vehicle trips. |
| 5.14.~~7~~8 | The applicant should prepare a travel plan ~~including~~adopting a vision-led approach to identify demand management and monitoring and fall- back measures ~~to~~ that proactively mitigate transport impacts~~. The applicant should also provide~~ by providing details of proposed measures to improve access by active, public and shared transport to:<br>• ~~reduce~~Reduce the need for parking associated with the proposal;<br>• ~~contribute~~Contribute to decarbonisation of the transport network; and | **Appendix B Outline Construction Worker Travel Plan of the Outline CTMP [APP-311]** contains the, setting out the good practice measures that will be in place to encourage sustainable transportation for the workforce, in a way that reduces both environmental and social impacts on the local area. The objective of the Outline Construction Worker Travel Plan is to encourage a reduction in the quantity of single-occupancy car journeys and to create a shift towards more sustainable modes of transport.<br>The Outline Construction Worker Travel Plan will be developed into a final detailed Construction Worker Travel |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | • ~~improve~~Improve user travel options by offering genuine modal choice. | Plan by the Main Works Contractor(s) should development consent be awarded. |
| 5.14.~~8~~9 | The assessment should also consider any possible disruption to services and infrastructure (such as road, rail and airports). | Operational effects to the transport network were scoped out of the assessment. The **Transport Assessment [APP-333]** assesses the potential for disruption to infrastructure during construction.<br>A long term road closure of Wymondham Road (Link PAR 5) is required and a 2.4 km diversion route between via Flordon Road and B1113 Norwich Road. This diversion route has been agreed with the Local Highway Authority who advised this would have no significant effects on the local highway network or road users given an increase of journey time of just two minutes is anticipated for drivers and no dedicated facilities for WCH are provided.<br>Short term temporary road closures associated with the open-cut cable swathe are also expected on some roads. However, these closures are likely to be for no more than four weeks and will be either managed or a road closure with a diversion provided. Therefore, no significant impact on WCH delay is expected. |
| | **Mitigation** | |
| 5.14.~~11~~12 | Where mitigation is needed, possible demand management measures must be considered. This could include identifying opportunities to:<br>• ~~reduce~~Reduce the need to travel by consolidating trips~~,~~;<br>• ~~locate~~Locate development in areas already accessible by active travel and public transport~~,~~;<br>• ~~provide~~Provide opportunities for shared mobility~~,~~;<br>• ~~re~~Re-mode by shifting travel to a sustainable mode that is more beneficial to the network~~,~~; | The Project will not generate any significant additional traffic during operation, therefore demand management has only been considered in relation to the short term, temporary construction effects.<br>As with all major infrastructure Projects, construction of the Project will require the use of additional vehicles, although these will be low in any given month and will also be spread across the extent of the Order Limits, to limit the effect in any geographical area.<br>The **Outline CTMP [APP-309]** sets out the proposed good practice measures to reduce demand during construction. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | • ~~retime~~Retime travel outside of the known peak times~~,~~; and<br>• ~~reroute~~Reroute to use parts of the network that are less busy. | Measures include the use of crew vans, promoting sustainable travel routes and workers travelling outside of peak hours. |
| 5.14.~~12~~13 | If feasible and operationally reasonable, such mitigation should be required, before considering requirements for the provision of new inland transport infrastructure to deal with remaining transport impacts. All stages of the project should support and ~~encourage~~prioritise a modal shift of freight from road to more environmentally sustainable alternatives, such as rail, cargo bike, maritime and inland waterways, as well as making appropriate provision for and infrastructure needed to support the use of alternative fuels including charging for electric vehicles. | Embedded measures are those that are intrinsic to and built into the design of the Project, which are presented in Table 4.2 in **Chapter 4: Project Description [APP-130].** Embedded measures relevant to Traffic and Transport include:<br>• The inclusion of a largely continuous haul road to reduce effects on the local highway network during construction, that which would be discontinued discontinuous at major obstructions along the corridor (major roads, railways, areas of environmental or historical significance and/or major watercourses).<br>• Construction vehicles would use the haul road to move along the site, reducing construction traffic on the local road network and confining traffic to the primary access routes and designated crossing locations. |
| 5.14.~~13~~14 | Regard should always be given to the needs of freight at all stages in the construction and operation of the development including the need to provide appropriate facilities for HGV drivers as appropriate. | The Project will not generate any significant additional traffic during operation. The site compounds will provide appropriate facilities for HGV drivers arriving at the site. |
| 5.14.~~14~~15 | The Secretary of State may attach requirements to a consent where there is likely to be substantial HGV traffic that:<br>• ~~control~~Control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements;<br>• ~~make~~Make sufficient provision for HGV parking, and associated high quality drive facilities either on the site | The **Outline CTMP [APP-309]** sets out the proposed measures for monitoring and managing the numbers, routings and timings of heavy goods vehicles (HGV) deliveries to reduce impacts on the local road network. The **CTMP [APP-309]** will be secured by Requirement 4 of Schedule 3 in the **Draft DCO [APP-056]**. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | or at dedicated facilities elsewhere, to support driver welfare, avoid 'overspill' parking on public roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions; and<br>• ~~ensure~~Ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force. | |
| 5.14.~~16~~17 | Applicants should consider the DfT policy guidance "Water Preferred Policy Guidelines for the movement of abnormal indivisible loads" when preparing their application. | Given the number of construction sites proposed and the rural location of the Project away from any notable waterways and rail stations, it is not possible to rely on waterborne or rail transport for construction of the Project. The **Transport Assessment [APP-333]** provides further details on this. |
| | **Secretary of State decision making** | |
| 5.14.~~18~~19 | A new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure and the Secretary of State should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development and by enhancing active, public and shared transport provision and accessibility. | The Project will not generate any significant additional traffic during operation. Construction related traffic and transport impacts have been avoided and reduced through the design of the Project, proposed access locations and through introduction of good practice measures such as those in the **Outline CTMP [APP-309]**. |
| 5.14.~~19~~20 | Where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the Secretary of State should consider requirements to mitigate adverse impacts on transport networks arising from the development, as set out below. | |
| 5.14.~~20~~21 | Development consent should not be withheld provided that the applicant is willing to enter into planning obligations for funding new infrastructure or requirements can be imposed to mitigate transport impacts. In this situation the Secretary | |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | of State should apply appropriately limited weight to residual effects on the surrounding transport infrastructure. | |
| 5.14.~~21~~22 | The Secretary of State should only consider refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision. | |
| **5.15** | **Resource and Waste Management** | |
| | **Applicant assessment** | |
| 5.15.~~8~~7 – 5.15.~~9~~8 | The applicant should set out the arrangements that are proposed for managing any waste produced and prepare a report that sets out the sustainable management of waste and use of resources throughout any relevant demolition, excavation and construction activities.<br>The arrangements described and a report setting out the sustainable management of waste and use of resources should include information on how re-use and recycling will be maximised in addition to the proposed waste recovery and disposal system for all waste generated by the development. They should also include an assessment of the impact of the waste arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation. | **Appendix B: Outline Site Waste Management Plan [APP-302]** of the **Outline CoCP [APP-300]** sets out the process for managing waste on the Project. It also presents a high-level assessment of the waste capacity in the region. It also sets out how the Project intends to implement the waste hierarchy and to reduce waste being sent to landfill. |
| 5.15.~~10~~9 | The applicant ~~is~~must consider the Circular Economy and how to ensure that their project aligns with the government's circular economy ambitions. In Wales applicants are encouraged to refer to ~~the Waste Prevention Programme for England: Maximising Resources Minimising Waste and 'Towards~~'Towards Zero Waste: Our Waste | **Appendix B: Outline Site Waste Management Plan (SWMP) [APP-302]** of the Outline CoCP [APP-300] sets out the process for managing waste on the Project. The purpose of the Outline SWMP is to set out how the Project will seek to reduce the consumption of primary and raw materials and to encourage the use of secondary or |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | Strategy for ~~Wales' and should seek to minimise the volume of waste produced and the volume of waste sent for disposal unless it can be demonstrated that this is the best overall environmental outcome~~Wales. | recycled sources. It will also set out how the Project will follow the waste hierarchy by reducing waste produced first before considering alternatives such as reuse, recycling and repurposing. The Main Works Contractor(s) will be responsible for implementing the measures outlined within the SWMP and associated management plans. |
| 5.15.~~12~~11 | ~~The UK is committed to moving towards a more 'circular economy'.~~The UK is committed to transitioning to a circular economy, a future where resources are kept in use for longer, and waste is reduced; we accelerate the path to net zero, we see investment in critical infrastructure and green jobs, our economy prospers, and nature thrives. Where possible, applicants are encouraged to source materials from recycled or reused sources and use low carbon materials, sustainable sources and local suppliers. Construction best practices should be used to ensure that material is reused or recycled onsite where possible. | **Appendix B: Outline Site Waste Management Plan (SWMP) [APP-302]** of the **Outline CoCP [APP-300]** sets out the process for managing waste on the Project. The purpose of the Outline SWMP is to set out how the Project will seek to reduce the consumption of primary and raw materials and to encourage the use of secondary or recycled sources. It will also set out how the Project will follow the waste hierarchy by reducing waste produced first before considering alternatives such as reuse, recycling and repurposing. The Main Works Contractor(s) will be responsible for implementing the measures outlined within the SWMP and associated management plans. |
| 5.15.~~13~~12 | Applicants are also encouraged to prepare a construction materials management plan to inform the use of construction best practices in relation to storing materials in an adequate and protected place on site to prevent waste, or degeneration of valuable materials, for example, from accidental damage or ~~vandalism.~~excessive weathering. The use of Building Information Management tools (BIM, or similar) to record the materials used in construction can help to reduce waste and realise further value in future decommissioning of facilities, by identifying materials that can be recycled or reused. | **Appendix B: Outline Site Waste Management Plan (SWMP) [APP-302]** of the Outline CoCP [APP-300] sets out the process for managing waste on the Project. Section 4.2 of the Outline SWMP sets out the specific measures for efficient material use during construction.<br>As set out in **Appendix C: Outline Soil Resource Plan of the Outline CoCP [APP-303]** measures will include but not be limited to the following:<br>• Details of the soil resources present<br>• How topsoil and subsoil will be stripped and stockpiled based on their specific characteristics<br>• Suitable conditions for when handling soil will be undertaken and climatic STOP conditions |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | • Indicative soil storage locations<br>• How soil stockpiles will be designed taking into consideration site conditions and the nature/composition of the soil<br>• Specific measures for managing sensitive soils<br>• Suitable protective surfacing where soil stripping can be avoided, based on sensitivity of the environment and proposed works<br>• Approach to reinstating soil that has been compacted, where required<br>• Details of measures required for soil restoration. |
| | **Secretary of State decision making** | |
| 5.15.~~14~~13 – 5.15.~~15~~14 | The Secretary of State should consider the extent to which the applicant has proposed an effective system for managing hazardous and non-hazardous waste arising from the construction, operation and decommissioning of the proposed development.<br>The Secretary of State should be satisfied that:<br>• ~~any~~Any such waste will be properly managed, both on-site and off-site~~.~~;<br>• ~~the~~The waste from the proposed facility can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arisings should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arisings in the area~~.~~; and<br>• ~~adequate~~Adequate steps have been taken to give consideration to the circular economy, minimise the volume of waste arisings, and of the volume of waste | **Appendix B: Outline Site Waste Management Plan (SWMP) [APP-302]** of the **Outline CoCP [APP-300]** sets out the process for managing waste, during construction, both on site and off site including potentially hazardous waste on the Project. The Outline Site Waste Management Plan sets out, in an auditable manner, how waste will be reduced, reused, managed, and disposed of in accordance with the waste hierarchy.<br>Dedicated areas have been identified on the construction plans to allow materials and wastes to be segregated at source, reducing the risk of damage or contamination.<br>The Outline SWMP has undertaken a review of local waste disposal sites has been completed in line with the requirements of the Overarching National Policy Statement for Energy (EN-1) (Department for Energy Security and Net Zero, 2024). The Project will not generate large quantities of waste for landfill, due to the nature of the waste anticipated (large proportions of which can be reused or recycled) and also due to the targets set by National Grid |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | arisings sent for recovery or disposal, except where that is the best overall environmental outcome. | with regards to waste management. Essex County Council is forecasting to be at capacity over the plan period, however there is landfill capacity within Suffolk, within which the majority of the Project lies. Therefore, the levels of waste estimated to be produced by the Project will not exceed the waste capacity available in the region.<br>With regards to operational waste the Main Works Contractor(s) will prepare a final SWMP which will be maintained and monitored throughout the construction. |
| 5.15.~~16~~15 | Where necessary, the Secretary of State should use requirements or obligations to ensure that appropriate measures for waste management are applied. | **Appendix B: Outline Site Waste Management Plan (SWMP) [APP-302]** of the **Outline CoCP [APP-300]** sets out the process for managing waste on the Project.<br>The **Outline CoCP [APP-300]** will be secured as secured by Requirement 4 of Schedule 3 of the **Draft DCO [APP-056].** |
| 5.15.~~17~~16 | The Secretary of State may wish to include a condition on revision of waste management plans at reasonable intervals when giving consent. | **Appendix B: Outline Site Waste Management Plan (SWMP) [APP-302]** of the **Outline CoCP [APP-300]** sets out the process for managing waste on the Project. The Main Works Contractor(s) will be responsible for implementing the measures outlined within the SWMP and associated management plans. |
| 5.15.~~18~~17 | Where the project will be subject to the Environmental Permitting regime, waste management arrangements during operations will be covered by the permit and the considerations set out in Section 4.12 will apply. | **Appendix B: Outline Site Waste Management Plan (SWMP) [APP-302]** of the **Outline CoCP [APP-300]** sets out the process for managing waste on the Project.<br>The Project will be run in compliance with all relevant legislation, consents and permits in accordance with good practice measure GG01 of the **Outline CoCP [APP-300]**. Where required, permits from relevant planning authorities and/or the Environment Agency, will be sought prior to commencement of the relevant works. Consultation will be undertaken by the Main Works Contractor(s) with the appropriate bodies. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 5.15.~~19~~18 | The Secretary of State should have regard to any potential impacts on the achievement of resource efficiency and waste reduction targets set under the Environment Act 2021 ~~or wider goals set out in the government's Environmental Improvement Plan 2023.~~and circular economy objectives. | **Appendix B: Outline Site Waste Management Plan (SWMP) [APP-302]** of the **Outline CoCP [APP-300]** sets out the process for managing waste on the Project. Section 2.5 of the SWMP sets out the targets for material management and waste reduction. |
| **5.16** | **Water Quality and Resources** | |
| | **Applicant assessment** | |
| 5.16.3 | Where the project is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment, and how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment, as part of the ES or equivalent (see Section 4.3 and 4.10). | **ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]** details the likely significant effects of the Project on the water environment with respect to surface water. The baseline of the water environment is characterised in this chapter. The assessment has been informed by a **Water Framework Directive (WFD) Assessment [APP-332]**. |
| 5.16.4 | The applicant should make early contact with the relevant regulators, including the local authority, the ~~Environment Agency~~EA and Marine Management Organisation, where appropriate, for relevant licensing and environmental permitting requirements. Applicants should make early contact with the EA, NRW and water companies~~250~~ with their proposed water requirements to understand whether water is available and if new water infrastructure is required. If insufficient water is available for abstraction the EA and NRW will be unable to authorise an abstraction licence. | National Grid has continued to engage with the Environment Agency throughout the design and evolution of the Project, through various consultation exercises and through thematic meetings. All engagement is recorded in the **Draft Statement of Common Ground Environment Agency [APP-103]**. In addition, National Grid has continued to engage with the Local Authorities and specifically in this regard in their capacity as the Lead Local Flood Authority (LLFA).<br>Discussions have informed the development of the FRA, amongst other matters. National Grid also circulated a draft version of the FRA to the Environment Agency and LLFA ahead of the submission of the application for development consent for their consideration and comment. Subsequently, the consultees' feedback was taken into |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | consideration whilst preparing the FRA submitted with the application for development consent. Details on the consultation undertaken can be found in Section 1.3 of the **FRA [APP-331]**.<br>Details on how consultation responses have informed the assessment can be found in the Consultation Report **[APP-066]**. A series of water environment thematic meetings have been held with the Environment Agency, local authorities and the Local Lead Flood Authorities and the Water Management Alliance Internal Drainage Boards. Further information on these thematic meetings is set out in Table 12.1 of **ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]**. National Grid made early contact with relevant regulators including the Marine Management Organisation MMO. The **Consultation Report [APP-066]** details the MMOs comments which concluded that the development is an inland development so would not require a marine licence, therefore National Grid have not consulted further with the MMO. |
| 5.16.5 | Where ~~possible~~appropriate, applicants ~~are encouraged to~~should manage surface water during construction by treating surface water runoff from exposed topsoil prior to discharging and to limit the discharge of suspended solids e.g. from car parks or other areas of hard standing, during operation. | Table 6.1 of the **Outline CoCP [APP-300]** sets out the measures that will be implemented to safeguard surface water and groundwater water quality and manage land drainage and flood risk during construction of the Project. The Plan will demonstrate how runoff across the site will be controlled to prevent any off-site increases in flood risk.<br>In accordance with good practice measure W13, the layout of the site compounds will be planned to control potential risks to surface water, groundwater and flooding.<br>The main site compound is assumed to be connected to mains water supply, subject to approvals from the relevant utility provider. Wastewater will undergo suitable treatment measures such as biodigesters or would be taken away by tankers to a suitable disposal unit. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | No surface water discharges to watercourses or existing drainage systems have been identified to date. However, in accordance with good practice measure GG01, the Project will be delivered and operated in compliance with all relevant legislation, consents and permits, therefore any consents would be sought where appropriate. There is a low risk of the Project generating significant effects on surface water receptors.<br>Commitment GG27 of the Outline CoCP states that the appointed Main Works Contractor(s) will prepare a Construction Surface Water Management Plan (CSWMP) to inform discharge of the DCO Requirement. |
| 5.16.6 | Applicants ~~are encouraged~~should avoid locating potentially polluting activities in the most sensitive locations for groundwater, in particular Source Protection Zone 1 (SPZ) and close to nationally important drinking water supplies. Applicants should consider implementing protective measures to control the risk of pollution to groundwater ~~beyond those outlined in River Basin Management Plans and Groundwater Protection Zones – this could include~~, for example, through the use of protective barriers. | Measures to control the risk of pollution to groundwater are included in Table 6.1 of the **Outline CoCP [APP-300]** and **ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]**. |
| 5.16.7 | The ES should in particular describe:<br>• ~~the~~The existing quality of waters affected by the proposed project and the impacts of the proposed project on water quality, noting any relevant existing discharges, proposed new discharges and proposed changes to discharges;<br>• ~~existing~~Existing water ~~resources281~~resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction | **ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]** details the existing baseline (including quality and existing physical characteristics) and the likely significant effects of the Project on the water environment with respect to surface water, and the existing baseline and the likely significant effects on groundwater receptors (including SPZ and abstractions). The assessment has been informed by a **WFD Assessment [APP-332]**.<br>Section 12.5 of **ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]** includes a description of future baseline conditions which takes the |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | rates (including any impact on or use of mains supplies and reference to Abstraction Licensing Strategies) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance;<br>• ~~existing~~Existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project and any impact of physical modifications to these characteristics;<br>• ~~any~~Any impacts of the proposed project on water bodies or protected areas (including shellfish protected areas) under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and source protection zones (SPZs) around potable groundwater abstractions;<br>• ~~how~~How climate change could impact any of the above in the future; and<br>• ~~any~~Any cumulative effects. | likely impacts of climate change into account. The **FRA [APP-331]** also addresses climate change.<br>The inter-project cumulative assessment presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** included a 'cut-off date' of 1 April 2025 to confirm the long list of cumulative developments to be assessed. However, since 1 April the Applicant has been undertaking monthly reviews of planning registers and Local Planning Authority websites and will continue to do so during the Examination period, to check whether there are any new relevant developments / allocations. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement, these would be published into Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate). ~~Cumulative effects are addressed in ES Chapter 17: Cumulative Effects (document reference 6.17).~~ |
| | **Mitigation** | |
| 5.16.8 | The Secretary of State should consider whether mitigation measures are needed over and above any which may form part of the project application. A construction management plan may help codify mitigation at that stage. | The assessment presented in **ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]** has concluded that with mitigation measures (set out in the **Outline CoCP [APP-300]**) in place there are no likely long term significant residual effects in relation to water environment receptors during the construction of the Project. Effects on watercourses, their water quality and hydromorphology, and effects on existing surface water interests (abstractions and discharges) are scoped out for operation (and maintenance) in accordance with the **EIA Scoping Opinion [APP-297].**<br>Discussions would be held with the Environment Agency in relation to any required consents and permits necessary of |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | the works, in accordance with commitment W01 in the **Outline CoCP [APP-300]**. The works would subsequently be carried out in accordance with the requirements of these consents, thereby safeguarding water environment receptors. Water pollution from permanent drainage will be avoided by timed inspections and maintenance by the Applicant, as required to safeguard surface and groundwater quality. |
| 5.16.~~9~~10 | The risk of impacts on the water environment can be reduced through careful design to facilitate adherence to good pollution control practice. For example, designated areas for storage and unloading, with appropriate drainage facilities, should be clearly marked. | Embedded measures relevant to hydrology, land drainage and flood risk are summarised in **Section 12.6 of ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]** and good practice measures are set out in the **Outline CoCP [APP-300].** |
| 5.16.~~10~~11 | The impact on local water resources can be minimised through planning and design for the efficient use of water, including water recycling. If a development needs new water infrastructure, significant supplies or impacts other water supplies, the applicant should consult with the local water company and the EA or NRW. | No new consumptive surface water abstractions are anticipated to facilitate the Project during construction. The assessment presented within **ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]** assumes that there may be the need for temporary 'short-term dewatering' of open cut trenches to remove rainwater and minor groundwater seepages would be made to the ground. Further details are provided in **ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]**. |
| | **Secretary of State decision making** | |
| 5.16.~~11~~12 | Activities that discharge to the water environment are subject to pollution control. The considerations set out in Section 4.12 on the interface between planning and pollution control therefore apply. These considerations will also apply in an analogous way to the abstraction licensing regime regulating activities that take water from the water environment, and to the control regimes relating to works to, and structures in, on, or under controlled waters. | In accordance with commitment GH11 in the **Outline CoCP [APP-300],** a Hydrogeological Risk Assessment will be undertaken once the trenchless crossing method has been confirmed. This will assess the risks on groundwater or surface water quality associated with the construction method including considering the potential for breakout of drilling fluids, where appropriate. Where the assessment identifies an unacceptable risk to groundwater or surface water quality, then alternative methods and/or additives |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | shall be proposed, assessed and used. The hydrogeological risk assessment will be submitted to the Environment Agency for approval prior to construction.<br>Commitment GG38 in the **Outline CoCP [APP-300]**, sets out that there will be no intentional discharge of site runoff to ditches, watercourses, drains, including highways drainage systems, or sewers without appropriate treatment and agreement of the appropriate authority |
| 5.16.~~12~~13 | The Secretary of State will need to give impacts on the water environment more weight where a project would have an adverse effect on the achievement of the environmental objectives established under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017. | A **WFD Assessment [APP-332]** has been produced as part of the application for development consent. The WFD Assessment concludes that the Project is compliant with the objectives of the WFD and would not have an adverse effect on the achievement of the environmental objectives. |
| 5.16.~~14~~15 | The Secretary of State should be satisfied that a proposal has regard to current River Basin Management Plans and meets the requirements of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (including regulation 19). The specific objectives for particular river basins are set out in River Basin Management Plans. The Secretary of State must refuse development consent where a project is likely to cause deterioration of a water body or its failure to achieve good status or good potential, unless the requirements set out in ~~Regulation~~regulation 19 are met. A project may be approved in the absence of a qualifying Overriding Public Interest test only if there is sufficient certainty that it will not cause deterioration or compromise the achievement of good status or good potential. | A **WFD Assessment [APP-332]** has been produced as part of the application for development consent. The WFD Assessment includes information on the relevant River Basin Management Plans and concludes that the Project is compliant with the objectives of the WFD and would not have an adverse effect on the achievement of the environmental objectives. |
| 5.16.~~15~~16 | The Secretary of State should also consider the interactions of the proposed project with other plans such | The Project does not interact with the coastline and has a very low consumptive water demand (linked to the |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | as Water Resources Management Plans and Shoreline Management Plans. | construction phase only), therefore has no interactions with those other Plans. |
| 5.16.~~16~~17 | The Secretary of State should consider proposals to mitigate adverse effects on the water environment and any enhancement measures put forward by the applicant and whether appropriate requirements should be attached to any development consent and/or planning obligations are necessary. | The assessment presented in **ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]** has concluded that there are no likely significant residual effects in relation to water environment receptors during the construction or operation of the Project. The good practice measures for reducing effects on the water environment are set out in the **Outline CoCP [APP-300]**. |

## 1.3 Signposting for Compliance with NPS EN-5 (January 2026)

Table 1.9 Signposting for Compliance with EN-5

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
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| **1.6** | **Infrastructure covered by this NPS** | |
| 1.6.2 | This NPS covers above ground electricity lines:<br>• ~~i. whose~~Whose nominal voltage is expected to be 132kV or above (other than a 132kV line associated with the construction or extension of a devolved Welsh generating station);<br>• ~~ii. whose~~Whose length is greater than 2km;<br>• ~~iii. that~~That are not a replacement line falling within ~~Section~~section 16(3)(ab) of the ~~2008Act~~Planning Act 2008; and<br>• ~~iv. that~~That are not otherwise exempted for reasons set out in ~~Sections~~sections 16(3)(b) and (c), (3A) and (3B) of the Planning Act 2008~~ Act~~. | Policies 1.6.2 and 1.6.4 confirm that NPS EN-5 applies to the Project. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 1.6.4 | In addition, this NPS will apply to other kinds of electricity networks infrastructure including offshore transmission of any type (defined at ~~section~~Section 2.12~~.4~~), underground cables at any voltage, associated infrastructure as referred to above (Section 1.6) and lower voltage overhead lines, where that infrastructure becomes subject to the ~~2008~~Planning Act 2008 in the following circumstances:<br>~~i. if~~If it constitutes associated development for which consent is sought along with an NSIP such as an offshore wind generating station or relevant overhead line; or~~ii. if~~If the Secretary of State gives a direction under ~~Section~~section 35 of the Planning Act 2008 ~~Act~~ (for developments which, when completed, will be wholly in one or more of the areas specified in subsection 35(3)) that it should be treated as an NSIP and requires a development consent order (DCO). | |
| **Chapter 2: Assessment and Technology Specific Information** | | |
| **2.1** | **Introduction** | |
| 2.1.5 | As stated in Section 4.2 of EN-1, to support the urgent need for new low carbon infrastructure, all power lines in scope of EN-5 including electricity network reinforcement and upgrade works, and associated infrastructure such as substations, are considered to be CNP infrastructure. This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System. | NPS EN-1 classifies transmission Projects, such as Norwich to Tilbury, as Critical National Priority (CNP) infrastructure. This further reinforces the urgent need for the Project. |
| 2.1.6 | The assessment principles outlined in ~~Section~~Part 4 of EN-1 continue to apply to CNP infrastructure. Applicants must show how any likely significant negative effects | The need for the Project is summarised in Chapter 3 of the **Planning Statement [APP-085]** and the **Strategic Options Backcheck and Review Report [APP-355]**. New connections |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. Early application of the mitigation hierarchy is strongly encouraged, as is engagement with key stakeholders including Statutory Nature Conservation Bodies (SNCBs), both before and at the formal pre-application stage. | for new offshore wind and nuclear power generation Projects and for interconnectors into East Anglia are expected to continue in addition to the current contracted position. These new connections are being constructed or are expected to connect into substations at Necton, Norwich Main, Bramford, Friston and Sizewell. Additionally, agreements are in place with two offshore wind farm Projects and an interconnector based on their connections into a new EACN Substation. National Grid has a duty to facilitate new connections and maintain a safe National Electricity Transmission System (NETS) and has considered the capability of the existing network to support such connections.<br>In accordance with national policy requirements, the Project has been designed following the mitigation hierarchy. At the routeing and siting stage, the Project design process was informed by the Holford and Horlock Rules to avoid impacts where possible. These established guidelines informed the evaluation criteria and how the mitigation hierarchy was applied during the options selection process.<br>The adopted design approach is set out within **ES Chapter 3: Alternatives [APP-127]** which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the application for development consent.<br>Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features as far as reasonably practicable. The Project has considered sensitive areas and design minimisation of impacts.<br>The mitigation hierarchy is a key component of the Environmental Impact Assessment Process. **ES Chapter 5: EIA Approach and Method [APP-135]** describes the mitigation hierarchy as a |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | stepped process that helps development projects to address potentially adverse impacts on the environment.<br>The **Consultation Report [APP-066]** provides a complete overview of the consultation and stakeholder engagement activities on the Project and explains how National Grid has had regard to the statutory guidance about the pre-application procedure pursuant to Section 50 of the Planning Act 2008.<br>National Grid has undertaken a number of environmental and thematic meetings with environmental organisations to gather information about the baseline environment, scope of the assessment and potential effects and mitigation. The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. National Grid has prepared draft Statements of Common Ground with the SNCBs capturing details of matters agreed through this engagement. |
| **2.2** | **Factors influencing site selection and design** | |
| 2.2.1 | The Secretary of State should bear in mind that the initiating and terminating points – or development zone – of new electricity networks infrastructure is not substantially within the control of the applicant. | The need for the Project is summarised in Chapter 3 of the **Planning Statement [APP-085]** and the **Strategic Options Backcheck and Review Report [APP-355]**. New connections for new offshore wind and nuclear power generation Projects and for interconnectors into East Anglia are expected to continue, in addition to the current contracted position. These new connections are being constructed or are expected to connect into substations at Necton, Norwich Main, Bramford, Friston and Sizewell. Additionally, agreements are in place with two offshore wind farm Projects and an interconnector based on their connections into a new EACN Substation. National Grid has a duty to facilitate new connections and maintain a safe National |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | Electricity Transmission System (NETS) and has considered the capability of the existing network to support such connections. |
| 2.2.2 | Siting is determined by:<br>• ~~the~~The location of new generating stations or other infrastructure requiring connection to the network, and/or<br>• ~~system~~System capacity and resilience requirements determined by the ~~Electricity System Operator~~NESO. | The need for the Project is summarised in Chapter 3 of the **Planning Statement [APP-085]** and the **Strategic Options Backcheck and Review Report [APP-355]**. New connections for new offshore wind and nuclear power generation Projects and for interconnectors into East Anglia are expected to continue in addition to the current contracted position.<br>East Anglia's 400 kV electricity transmission network was built in the 1960s. It was built to supply regional demand, centred around Norwich and Ipswich. With the growth in new energy generation from offshore wind, nuclear power and interconnection with other countries, there will be more electricity connected in East Anglia than the network can currently accommodate.<br>As a result, and to comply with its duties, National Grid needs to reinforce the electricity network to allow power to be imported to and exported from East Anglia. The reinforcement would provide additional capability to connect to areas of demand, allowing power flows across boundaries, and linking interconnectors to and from Europe.<br>The National Grid Electricity System Operator (ESO) concluded that the existing high voltage electricity network in East Anglia does not have the capacity needed to reliably and securely transport all the energy that will be connected into the network while meeting the National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS).<br>The **Design Development Report [APP-122], Design and Access Statement [APP-353] and Design Approach for Site Specific Infrastructure [APP-354] and Design and Access Statement and Planning Statement [APP-085]** should be read alongside both **ES Chapter 3: Alternatives [APP-127]**, which documents the key environmental factors in consideration of the |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | alternatives, and explain explains how planning policy, as well as the requirements of the Electricity Act and the principles of the Holford and Horlock Rules, have influenced the optioneering and design evolution process. |
| 2.2.3 | These twin constraints, coupled with the government's legislative commitment to net zero by 2050, ~~strategic commitment to new interconnectors with neighbouring North Seas countries7~~government's expectation of 12-14GW of interconnector capacity by 2030, and an ambition of ~~up to 50GW of offshore wind generation by 2030~~accelerating the deployment of clean energy capacity and energy storage to meet our ambitions for the Clean Power 2030 Mission, means that very significant amounts of new electricity networks infrastructure is required, including in areas with comparatively little build-out to date. | Offshore wind energy has an important role to play in delivering this strategy, and a significant step change is required to deliver up to 50 GW of offshore wind energy by 2030, given the current capacity is around 13 GW. Energy networks will be a critical enabler for the clean energy transition; however, the scale and pace of investment needed to meet the UK's decarbonisation targets are significant. National Grid sits at the heart of Britain's energy system, connecting millions of people and businesses to the energy they use every day. Overall, National Grid will be investing around £15bn in the UK over 5 years to upgrade our networks and support the UK's net zero ambition. The Great Grid Upgrade is the largest overhaul of the electricity grid in generations. National Grid's infrastructure Projects across England and Wales are helping to connect more renewable energy to homes and businesses.<br>The growth in offshore wind, nuclear generation, and interconnector capacities in East Anglia greatly increase the power transfer requirements out of the region as local total generation will exceed local demand. The existing high voltage electricity network in East Anglia does not have the capability needed to reliably and securely transport all the energy that will be connected while meeting the Security and Quality of Supply Standard (SQSS). Several network reinforcements Projects are planned to address the shortfall of which the Project is one.<br>The need for the Project is summarised in Chapter 3 of the Chapter 3 of the **Planning Statement [APP-085]** and the **Strategic Options Backcheck and Review Report [APP-355]**. Increased transmission capability is required in the East Anglia |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | region, to allow National Grid to maintain a robust network, remain in accordance with its licence obligations, and to allow new sources of electricity generation to connect. This is vital to facilitate the ambitious targets set by the Government, for secure, clean and affordable energy for the long term.<br>The NESO's Clean Power 2030 report (NESO, 2024) identifies the Project as critical to delivering a network which supports the clean power pathways, but at present has a delivery date after 2030. Support is therefore needed to bring the Project forward for 2030 delivery.<br>NESO's Clean Power 2030 report also states that the Project (AENC and ATNC – the Network Options Assessment code for Norwich to Tilbury) and Sea Link are critical for connecting offshore wind in the North Sea and supporting the flow of clean power. Constraint costs arise when NESO has to manage this problem by paying generators to reduce (turn-down) their electricity output in areas that are congested and switch on (turn-up) in locations closer to electricity users. |
| 2.2.5 | Additionally, applicants retain control in managing the identification of routing and site selection between the identified initiating and terminating points or within the development zone. | **ES Chapter 3: Alternatives [APP-127]** sets out the alternatives which were considered as part of the Project development. The Chapter summarises a number series of earlier studies which considered alternative route corridors, substation siting and technology options. It presents the alternatives that were studied as part of the development of the Project, focusing on strategic and significant alternatives.<br>ES Chapter 3 should be read in conjunction with the following reports:<br>• Corridor and Preliminary Routing and Siting Study (CPRSS) (National Grid, 2022)<br>• Strategic Options Backcheck and Review (SOBR) (National Grid, 2023) |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | • Design Development Report (National Grid, 2023)<br>• Design Development Report (National Grid, 2024)<br>• **Strategic Options Backcheck and Review (SOBR) [APP-355]**<br>• **Design Development Report [APP-122]** |
| 2.2.6 | Moreover, the locational constraints identified above do not, of course, exempt applicants from their duty to consider and balance the site-selection considerations set out below, much less the policies on good design and impact mitigation detailed in ~~sections~~Sections 2.4~~-~~ and Section 2.~~9~~10. | National Grid will develop a well-designed Project which responds positively to policy drivers, environmental constraints and comments from stakeholders and the public, providing mitigation where necessary in order to overcome adverse impacts which can be associated with overhead lines. |
| 2.2.7 | The connection between the initiating and terminating points of a proposed new electricity line will often not be via the most direct route. Siting constraints, such as engineering, environmental or community considerations will be important in determining a feasible route. | The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. Embedded mitigation measures have been integral in reducing, and where possible, avoiding, the landscape and visual effects of the Project. The **Design Development Report [APP-122], Design and Access Statement [APP-353]** and **Design Approach for Site Specific Infrastructure [APP-354]** presents the different choices made during the design process. These documents should be read alongside both **ES Chapter 3: Alternatives [APP-127],** which documents the key environmental factors in consideration of the main alternatives, and **Planning Statement [APP-085]**, which explains how planning policy, as well as the requirements of the Electricity Act and the principles of the Holford and Horlock Rules, have influenced the optioneering and design evolution process. The latter demonstrating how such policy and legislative objectives have been embedded into the design of the Project. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 2.2.8 and 2.2.9 | There will usually be a degree of flexibility in the location of the development's associated infrastructure such as substations, and applicants should consider carefully their location, as well as their design.<br>In particular, the applicant should consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other options to mitigate any impacts. (See ~~Section~~ Sections 2.9-2.10 below and Section 5.10 in EN-1.) | The Horlock Rules provide guidelines for the siting and design of new substations, or substation extensions and these rules have been an important consideration in the design and siting of the EACN and Tilbury North substations which is associated development to the NSIP. The Horlock Rules require National Grid to consider local topography and the possibilities for screening.<br>The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of the siting of substations and CSE compounds through the application of design principles. The **Design Development Report [APP-122]** and **Design Approach for Site Specific Infrastructure [APP-354]** present the different choices made during the design process. |
| 2.2.10 | As well as having duties under ~~Section~~section 9 of the Electricity Act 1989, (in relation to developing and maintaining an economical and efficient network), applicants must take into account Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to "have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and …do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects."9 | As a licence holder National Grid has specific duties to uphold in relation to the desirability of preserving amenity of certain aspects of the environment and to mitigate the effects of its activities on the environment under Section 38 and Schedule 9 of the Electricity Act 1989. National Grid's Schedule 9 Statement (2016) sets out how the company would meet the duty placed upon it by the aforementioned legislation.<br>As set out in **ES Chapter 8: Ecology and Biodiversity [AS-026]** the Project has been designed, as far as practicable following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project.<br>The landscape and visual impacts of the Project are assessed in **ES Chapter 13: Landscape and Visual [APP-226].** Throughout the design process measures have been taken to reduce the landscape and visual effects of the Project as far as practicable. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | **ES Chapter 11: Historic Environment [AS-068]** reports the assessment of the assessment of the likely significant historic environment effects that could result from the Project. The ES chapter concludes that the Project would not result in substantial harm to any heritage assets and assesses the assets that will be subject to less than substantial harm. |
| 2.2.11 | Depending on the location of the proposed development, statutory duties under ~~Section~~section 85 of the Countryside and Rights of Way Act 2000, Section 11A of the National Parks and Access to the Countryside Act 1949 (as amended by ~~Section~~section 62 of the Environment Act 1995), and ~~Section~~section 17A of the Norfolk and Suffolk Broads Act 1988 may be relevant. Applicants should note amendments to each of these provisions contained in ~~Section~~section 245 of the Levelling Up and Regeneration Act 2023. | The relevant section, Section 245 (Protected landscapes), of the Levelling-Up and Regeneration Act 2023 states (and where relevant to the Project),<br>'*(A1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.*<br>*(A2) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a devolved Welsh authority must have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty*.'<br>The clause expands the duty on certain public authorities, including Statutory Undertakers (including National Grid), when carrying out functions in relation to these landscapes to seek to further the statutory purpose and confers a power to make provision as to how they should do this.<br>The legislation has been expanded from 'having regard' to 'furthering the purpose' of protected landscapes such as National Landscapes.<br>In any event, National Grid considers the Project is compliant with the new 2023 Act obligation as set out above, as the Project |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | proposes to underground the proposed 400 kV overhead line within the National Landscape and beyond its boundary.<br>The potential measures and approach to the protected landscape duty being taken by National Grid has been discussed with stakeholders to seek their feedback. Engagement is being undertaken with the Dedham Vale National Landscape Partnership and relevant local authorities. This engagement is ongoing.<br>The measures to evidence the 'seek to further' duty under s245 of the Levelling-Up and Regeneration Act 2023 are still being developed and discussed with the stakeholders. These measures will continue to be developed taking account of feedback, in consideration of the Project effects, special qualities and the Dedham Vale AONB and Stour Valley Project Area Management Plan 2021-2026. This is reported in the National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) **[APP-120]**.<br>A further update will be provided in addition to details regarding how the measures to seek to evidence the duty will be secured in due course. |
| 2.2.12 | Transmission and distribution licence holders are also required under Schedule 9 to the Electricity Act 1989 to produce and publish a statement setting out how they propose to perform this duty generally. | National Grid's Schedule 9 Statement (2016) sets out how the company would meet the duty placed upon it by the aforementioned legislation. |
| **2.3** | **Climate change adaptation and resilience** | |
| 2.3.1 to 2.3.2 | Section 4.10 of EN-1 sets out the generic considerations that applicants and the Secretary of State should take into account in order to ensure that electricity networks infrastructure is resilient to the effects of climate change.<br>As climate change is likely to increase risks to the resilience of some of this infrastructure, from flooding for | The effects of climate change on flood risk over the lifetime of the Project are assessed in the **FRA [APP-331]**, which also details the embedded and good practice measures to make the Project resilient to climate change. National Grid has incorporated climate change adaptation and resilience throughout the Project's design and lifetime. Above-ground elements, including |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | example, or in situations where it is located near the coast or an estuary or is underground, applicants should in particular set out to what extent the proposed development is expected to be vulnerable, and, as appropriate, how it has been designed to be resilient to:<br>• ~~flooding~~Flooding, particularly for substations that are vital to the network; and especially in light of changes to groundwater levels resulting from climate change;<br>• ~~the~~The effects of wind and storms on overhead lines;<br>• ~~higher~~Higher average temperatures leading to increased transmission losses;<br>• ~~earth~~Earth movement or subsidence caused by flooding or drought (for underground cables); and<br>• ~~coastal~~Coastal erosion – for the landfall of offshore transmission cables and their associated substations in the inshore and coastal locations respectively. | substations, CSE compounds, and construction compounds, have been located in Flood Zone 1 to avoid areas of significant flood risk, as described in the FRA and **ES Chapter 3: Alternatives [APP-127].** Other structures, such as pylons and underground cables, are designed to National Grid's technical standards to withstand flooding, wind, storms, extreme temperatures, and earth movement. Consequently, the Project is considered resilient to climate change over its design life. |
| 2.3.3 | Section 4.10 of EN-1 advises that the resilience of the project to the effects of climate change must be assessed in the Environmental Statement (ES) accompanying an application. For example, future increased risk of flooding would be covered in any flood risk assessment (see ~~Sections~~Section 5.8 in EN-1). Consideration should also be given to coastal change (see ~~sections~~Section 5.6 in ~~EN1~~EN-1). | |
| **2.4** | **Consideration of good design for energy infrastructure** | |
| 2.4.1 | The Planning Act 2008 requires the Secretary of State to have regard, in designating an NPS, and in determining applications for development consent to the desirability of good design. | Good design of electricity transmission infrastructure is primarily governed by application of the -Holford and Horlock rules, alongside an iterative design approach informed by stakeholder engagement, relevant sections of national policy (NPS EN-1 and |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 2.4.2 | Applicants should consider the criteria for good design set out in EN-1 Section 4.7, the Holford and Horlock rules and Electricity Transmission Design Principles (see Section 2.9 below) at an early stage when developing projects. | EN-5) and the embedded environmental design mitigation as part of the EIA process.<br>Such good design principles are then intertwined with the technical design requirements alongside the regulatory and other constraints such as operational, safety and security requirements for new electricity transmission infrastructure.<br><br>T**he Planning Statement [APP-085], the Design and Access Statement [APP-353] and Design Approach for Site Specific Infrastructure [APP-354]** explains how the Project complies with the criteria for good design set out in EN-1 and summarises the Project's design and site selection process. This is also covered within the following is documented in detail in the following reports:<br>• **ES Chapter 3: Alternatives [APP-127]**<br>• **Strategic Options Backcheck and Review Report [APP-355]**<br>• **Design Development Report [APP-122]**<br>• **Design and Access Statement [APP-353]**<br>• **Design Approach to Site Specific Infrastructure [APP-354]**<br>The above documents provide details of how the design process was conducted and how the design has evolved. They demonstrate how the Project has undergone an iterative design process led by the early consideration of environmental and planning constraints to avoid and minimise impacts. |
| 2.4.3 | However, the Secretary of State should bear in mind that electricity networks infrastructure must in the first instance be safe and secure, and that the functional design constraints of safety and security may limit an applicant's | This is noted and the design considerations have taken place within the context of meeting National Grid's duty to be economical and efficient and also within the rigorous health and safety processes that National Grid has in place than govern how it designs and constructs its Projects safely. National Grid is |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | ability to influence the aesthetic appearance of that infrastructure. | already required to ensure that the Project is designed in accordance with standards set out within or overseen by, amongst others, the Electricity Supply, Quality and Continuity Regulations, British Standards (BS), European Standards, the 'Conseil International des Grands Réseaux Electriques', the International Electrotechnical Commission, and the Electricity Networks Association. In addition, the Project must accord with each of the following: National Grid Design Standards, National Grid Technical Specification, National Grid Transmission Procedures, National Grid Policy Statement (Transmission), National Grid Technical Guidance Notes (Electricity) and National Grid Technical Reports (Electricity).<br>National Grid has considered the proposed materials and colour palette for the CSE compounds and new substation / substation extension including buildings to be sensitive to the environment they are located in, where practicable. Further information is included in the Design Approach for Site-Specific Infrastructure **[APP-354]**. |
| 2.4.4 | While the above principles should govern the design of an electricity networks infrastructure application to the fullest possible extent – including in its avoidance and/or mitigation of potential adverse impacts (particularly those detailed in ~~Sections~~Section 2.~~9 below~~10) – the functional performance of the infrastructure in respect of security of supply and public and occupational safety must not thereby be threatened. | See response to 2.4.3. |
| **2.5** | **Environmental and Biodiversity Net Gain** | |
| 2.5.1 | When planning and evaluating the proposed development's contribution to environmental and biodiversity net gain, it will be important – for both the applicant and the Secretary of State – to supplement the | The Project will deliver a minimum 10% BNG – The Project would deliver a net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported separately outside of the ES. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | generic guidance set out in EN-1 (Section 4.6) with recognition that the linear nature of electricity networks infrastructure can allow for excellent opportunities to:<br>• ~~reconnect~~Reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or<br>• ~~connect~~Connect people to the environment, for instance via footpaths and cycleways constructed in tandem with environmental enhancements. | Further details can be found in the **Biodiversity Net Gain Report [APP-299].**<br>While every effort has been made to deliver the required biodiversity units on-site through replacement planting and on-site mitigation in the form of habitat creation and enhancement, given the scale and nature of the Project, this 10 % net gain is not fully achievable on-site. Off-site biodiversity units are therefore proposed to make up this deficit.<br>Biodiversity is not bound by Local Authority area and therefore off-site Biodiversity Net Gain (BNG) will be considered across the length of the Project. However as detailed within the **7.1 Biodiversity Net Gain Report [APP-299]**, the aim is to deliver a biodiversity legacy ideally in each of the three Counties crossed by the Project (Norfolk, Suffolk and Essex). Off-site BNG sites will be selected based on a range of factors including proximity to the Project, geographical location, local nature recovery strategies, habitat type, habitat condition, cost and timings amongst others.<br>Discussions are currently taking place between National Grid and the Waveney and Little Ouse Recovery (WaLOR) scheme (Suffolk Wildlife Trust, 2025), a landscape recovery scheme which is located in the same geographic area as the Project. This project is seeking to deliver a number of BNG units in addition to the delivery of the WaLOR scheme and National Grid have discussed the opportunity to deliver approximately 600 area habitat units. This could comprise a mixture of woodland, other neutral grassland as well as the potential to deliver wetland mosaic habitats. The final mix of units and location will be explored as the WaLOR scheme develops. Suffolk Wildlife Trust have also identified Market Weston Fen a habitat bank in Suffolk that comprises mixed scrub and other neutral grassland. National Grid is currently in discussion with both parties to sign an |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | Expression of Interest and updated details will be provided accordingly.<br>Essex Wildlife Trust have issued a letter to National Grid confirming that they are happy to assist with the requirement of approximately 400 units in Essex, which include other neutral grassland, mixed scrub, individual trees and acid grassland. National Grid will continue to work with Essex Wildlife Trust to identify potential sites as the Project progresses.<br>National Grid is continuing these discussions with the Wildlife Trusts and other third parties in regard to securing the off-site units through a legal agreement (unilateral undertaking under s.106 of the Town and Country Planning Act 1990), and progress on such discussions will be provided accordingly. |
| **2.6** | **Land Rights and Land Interests** | |
| 2.6.1 | In order to be lawfully able to install, inspect, maintain, repair, adjust, alter, replace or remove an electricity line (above or below ground), its related equipment (such as monopoles, pylons/transmission towers, transformers and cables), and/or its associated mitigation or enhancement schemes, applicants must:<br>• ~~own~~Own the land on, over, or under which the relevant activity is to take place; or<br>• ~~hold~~Hold sufficient rights over or interests in that land (typically in the form of an easement); or ~~iii. have~~<br>• Have permission for the activity from the present owner or occupier of that land (typically in the form of a wayleave). | In the **Book of Reference [APP-064]** each land plot is numbered uniquely so that the prefix of the plot number relates to the land plan sheet number on which the plot appears. The **Land Plans [APP-008 to APP016]** show the Order Limits and the numbered plots within the Order Limits that are listed in the sections of the Book of Reference. Each plot is coloured. The colouring serves to differentiate the type of rights or powers sought for each given plot within the Order Limits which corresponds to the respective interest, right or power to be acquired or used. |
| 2.6.2 | Where the applicant does not own or wish to own the land in question, it should try to reach a voluntary agreement | National Grid will continue to attempt to seek all rights it needs by voluntary agreement, subject to the DCO being made. National Grid has undergone extensive consultation with all persons with |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | giving it sufficient rights and/or permissions to undertake the relevant work. | an interest in the relevant land in order to try to avoid the need for compulsory acquisition.<br>This approach to making the application for the DCO in parallel to conducting negotiations to acquire rights in land by agreement wherever practicable, is in accordance with Paragraph 25 of the Planning Act 2008: Guidance Related to Procedures for Compulsory Acquisition of Land, produced by the DCLG, as updated September 2013. |
| 2.6.3 | As a last resort, where it does not succeed in reaching the agreement that it requires, the network company may, as part of its application to the Secretary of State, seek to acquire rights compulsorily over the land in question by means of a provision in the DCO. | Justification for the use of compulsory acquisition powers is set out in the **Statement of Reasons [APP-059]**. |
| 2.6.4 | In such cases (i.e. where the compulsory acquisition of rights is sought) permanent arrangements are strongly preferred over voluntary wayleaves (which could, for example, be terminable on notice by the landowner) in virtue of their greater reliability and economic efficiency and reflecting the importance of the relevant infrastructure to the ~~nation's~~government's Clean Power and net zero goals. | It is National Grid's policy for all rights for new apparatus – underground cable or overhead line to be secured by easements as opposed to wayleaves. These are granted for a capital sum, and a legal interest is created in the affected land which is permanent and not terminable. |
| 2.6.5 | The applicant may also seek the compulsory acquisition of land. This will not normally be necessary where lines and cables are installed but may be sought where other forms of electricity networks infrastructure (such as new substations) are required. | Noted |
| 2.6.6 | As detailed in Section 4.1.8 of EN-1, where the use of land at a specific location is required to facilitate the development by providing for mitigation~~,~~ and landscape enhancement ~~and biodiversity net gain~~, an applicant may, as part of its application to the Secretary of State, seek the | The Environmental Areas are located on land to be acquired by National Grid. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | compulsory acquisition of that land, or rights over that land. The Secretary of State will consider any such application under the provisions of the Planning Act 2008 and any associated guidance. | |
| **2.7** | **Holistic planning** | |
| 2.7.1 | EN-1 explains ~~in Section 4.10~~ that the Planning Act 2008 aims to create a holistic planning regime, such that the cumulative effects of the same Project can be considered together. Co-ordinated applications typically bring economic efficiencies and reduced environmental impact. | The document "2024 National Grid Electricity Transmission Response to the ESO East Anglia Network Study (March 2024)" provides a response of National Grid Electricity Transmission (NGET) to the ESO East Anglia Network Study (the ESO Study) published by the Electricity System Operator (ESO) in March 2024. The ESO Study responds to the UK Government's ongoing Offshore Coordinated Support Scheme (OCSS). The ESO study has concluded the following:<br>• Economic: Option 3, which includes the Norwich to Tilbury Project with an additional Friston to EACN Substation line, is identified as the most economically optimal solution if Offshore Coordinated Connection System (OCSS) coordination between Sea Link and the two offshore wind farms progresses.<br>• Environment and Community: Option 3 is less constrained environmentally compared to offshore HVDC options, which have higher consenting risks due to converter stations.<br>• Deliverability: Environmental impacts of the Project can be mitigated with careful route planning and the use of appropriate technologies, adhering to National Policy Statements for nationally significant infrastructure Projects.<br>• Next Steps: The grant funding from OCSS does not change the requirement for the EACN Substation as part of Norwich to Tilbury. NGET must continue to meet its licence obligations and progress with Norwich to Tilbury until full offshore |
| 2.7.2 | Accordingly, the government envisages that, wherever reasonably possible, applications for new generating stations and their related infrastructure should be contained in a single application to the Secretary of State. However, a consolidated approach of this kind may not always be possible, nor represent the most efficient strategy for delivery of new infrastructure. | |
| 2.7.3 | This could be, for example, due to the differing lengths of time needed to prepare the applications for submission to the Secretary of State, or because a network application relates to multiple generation projects (which could be onshore or offshore), or because the works involved are strategic reinforcements required for a number of reasons. | |
| 2.7.4 | It may also be the case that the electricity networks infrastructure application and the application for a related generating station will of necessity come from different legal entities, or from entities subject to different commercial and regulatory frameworks. | |
| 2.7.5 | It will also be common for applications to be submitted for the general purpose of reinforcing the network, which will | |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | be critical to deliver especially in light of the drive towards net zero, including the ambition ~~for up to 50GW of offshore wind by 2030, and a CNP (see EN-3).~~to radically increase the deployment of new low carbon generation to meet our Clean Power 2030 Mission.. | coordination is confirmed, at which point reinforcement options will be reviewed.<br>Norwich to Tilbury has been identified as an "HND essential" option under the Holistic Network Design (HND) strategic planning framework. It has also been classified as an Accelerated Strategic Transmission Investment (ASTI) project by Ofgem, aimed at expediting the delivery of the UK Government's 2030 energy goals. |
| **2.8** | **Strategic Network Planning** | |
| 2.8.1 | A more strategic approach to network planning ~~will~~is essential to ensure that network development keeps pace with renewable generation and anticipates future system needs. ~~Strategic network planning, such as through the Holistic Network Design and its follow up exercises or through forthcoming Centralised Strategic Network plans, helps reduce the overall impact of infrastructure by identifying opportunities for coordination, where appropriate, and taking a holistic view of both the onshore and offshore network. Network plans will take account of environmental and community impacts, alongside deliverability and economic cost, from the outset.~~It is imperative that the strategic need for the infrastructure is given the highest priority given the urgency of bringing forward networks infrastructure. The time involved in bringing forward transmission projects underscores the importance of the strategic approach. | The Norwich to Tilbury Project is not being submitted as part of larger, single application which incorporates the renewable energy Projects which will connect into the electricity transmission network. In December 2023, the UK government funded a consortium—including National Grid's Sea Link Project, North Falls, and Five Estuaries offshore wind farms—to explore a coordinated offshore transmission design under the Offshore Coordination Support Scheme (OCSS). The consortium's feasibility study, submitted in March 2024, concluded that while coordination was technically feasible, it would entail:<br>• An increase in capital costs of up to £890 million<br>• Constraint costs associated with an outage on Sea Link exceeding £500 million<br>• A potential delay of up to five years for North Falls and Five Estuaries Projects<br>Given these significant additional costs and the adverse impact on the timeline for integrating more renewables into the UK energy system—especially in light of the government's commitment to quadruple offshore wind capacity and fully decarbonise the electricity system by 2030—the consortium decided not to pursue a coordinated offshore connection further. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | North Falls, Five Estuaries, and Sea Link submitted their applications for development to consent in advance of National Grid's Norwich to Tilbury Project. Due to these differing timelines, the Projects are proceeding separately.<br>The inter-project cumulative assessment presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** included a 'cut-off date' of 1 April 2025 to confirm the long list of cumulative developments to be assessed. However, since 1 April the Applicant has been undertaking monthly reviews of planning registers and Local Planning Authority websites and will continue to do so during the Examination period, to check whether there are any new relevant developments / allocations. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement, these would be published into Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate). |
| 2.8.~~2~~3 | A strategic approach to network planning proposed through the Centralised Strategic Network ~~Planning~~Plan (CSNP) process will identify strategic investments intended to facilitate achieving net zero, energy security and decarbonisation targets. | See response to 2.8.2 above. |
| 2.8.~~3~~4 | In these cases (i.e. where the application is a reinforcement project in its own right and does not accompany an application for a generating station, or is not underpinned by a contractually-supported agreement to provide an as-yet-unconsented generating station with a connection), the Secretary of State should have regard to the need case for new electricity networks infrastructure set out in Section 3.3 of EN-1~~.~~ with further detail set out here. | Primarily, the Project is a network reinforcement and without reinforcement the capacity of the East Anglia existing network is insufficient to accommodate the connection of the proposed new power sources. Increased transmission capability is, therefore, required in the East Anglia region, to allow National Grid to maintain a robust network, remain in accordance with its licence obligations and is required to connect a large number of electricity generators. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 2.8.5 | The need case for the CSNP infrastructure is endorsed by EN-1 in conjunction with this NPS subject to the CSNP being published on NESO's website following public consultation and once all stages of the CSNP Strategic Environmental Assessment (SEA) (and any other environmental assessments, including HRA, for specific designated sites identified) for that CSNP are adopted. | The increased capacity being provided by the Project is critical to delivering a network which supports the clean power pathways as set out in the Clean Power Action Plan 2030.<br>The Project responds to previously established policies and by coming forward as it is, also addresses the urgency and pace required to move towards delivering the necessary improvements to power infrastructure to respond to the challenges of meeting the obligations of the Clean Power Action Plan, and thereafter, net zero, making a significant contribution to both regional and national requirements.<br>The CSNP is a new long-term planning framework being developed by NESO to map demand and optimal transmission infrastructure needs to support net-zero goals. The CSNP has four key principles:<br>• plan strategically ahead of need to enable investments required for net zero<br>• ensure efficiency by taking a holistic view across the onshore and offshore networks<br>• Robust and transparent assessment of a broad range of options<br>• Accelerate delivery by providing certainty on options to support regulatory and planning processes.<br>The CSNP when published will take a broad, whole energy system view to transform the delivery of affordable, clean and secure power.<br>The CSNP builds on the Pathway to 2030 Holistic Network Design report. This Report and the accompanying ESO East Anglian Network Study (March 2024) consider different electricity network configurations and noting the role of the Project in managing increased power flows into the East Anglia Region. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 2.8.6 | On occasion applicants may submit a change control request to NESO. If the request is accepted by NESO, network designs may be amended and approved through an appropriate change control process. This process will assess the request against the same strategic network planning objectives of the CSNP as stated in Section 3.3.76 of EN-1. Changes that are accepted by NESO and do not deviate from the CSNP SEA (and any other required environmental assessments, including HRA, for specific designated sites identified) will have the same status in these NPSs as those brought forward under the full CSNP process. | This policy is noted by National Grid. |
| 2.8.~~4~~7 and 2.8.~~5~~8 | The Secretary of State should also take into account that Transmission Owners (TOs) and Distribution Network Operators (DNOs) are required under ~~Section~~section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design.<br>TOs and DNOs are also required to facilitate competition in the generation and supply of electricity, and ~~electricity distributors~~ have ~~a statutory duty~~ to provide a connection where requested. | See response to 2.2.10. |
| 2.8.~~7~~10 | Where it can be demonstrated that such a set of works will reinforce the network as a whole, or reinforce the network to accommodate a subset of new connections, the Secretary of State should be willing – in line with the need statement set out in Section 3.3 of EN-1 – to accept an application seeking development consent for the entire set of works. | The Project will reinforce the transmission system in East Anglia. Without reinforcement, the capacity of the existing network in East Anglia is insufficient to accommodate the connection of proposed new power sources connecting in the area. This reinforcement will ensure that the Project will improve the existing electricity transmission network, and will contribute to energy independence, the UK's decarbonisation requirements and climate change targets, and assist in ensuring the supply of |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | energy remains secure, reliable and affordable. As such, the Project is in accordance with this policy. |
| **2.9** | **Applicant assessment** | |
| | **Impacts** | |
| | **Biodiversity and Geological Conservation** | |
| 2.9.3 | Electricity networks infrastructure pose a particular potential risk to birdlife including large birds, such as swans and geese, and perching birds. These may collide with overhead lines and risk being electrocuted. Large birds may also be electrocuted when landing or taking off by completing an electric circuit between live and ground wires. Even perching birds can be killed as soon as their wings touch energised parts of the infrastructure. | To avoid earthing by design, insulators are of a sufficient size to prevent birds from being able to connect with both the conductor and the earthed pylon at the same time, which could result in electrocution. In addition, vegetation clearance in the permanent easement corridor (associated with statutory safety clearances) would be maintained to a three-year growth to avoid branches interfering with the conductors and subsequently birds perching on branches close to power lines which could result in earthing and electrocution.<br>**ES Chapter 8: Ecology and Biodiversity [AS-026]** concludes that there would be negligible impacts on birds at the operational stage of the Project. The survey data has not highlighted any areas of particular concern with regards to collision that would have an impact of local level or above. In addition, no Qualifying bird species of the Stour and Orwell Estuaries SPA and Ramsar Site were recorded in flight at Ardleigh Reservoir. Cormorant is a species which makes part of a waterbird assemblage on the SPA designation, and was recorded in flight, however the times were insignificant and as such collision risk impact has been screened out of the Habitat Regulations Assessment (HRA) for this site. |
| 2.9.4 | Applicants should consider measures to make lines more visible such as bird flappers and diverters which are covered in more detail in ~~paragraphs~~Sections 2.10.~~3~~2 and 2.10.4. | **ES Chapter 8: Ecology and Biodiversity [AS-026]** concludes that there would be negligible impacts on birds at the operational stage of the Project. The survey data has not highlighted any areas of particular concern with regards to collision that would have an impact of local level or above. In addition, no Qualifying |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | bird species of the Stour and Orwell Estuaries SPA and Ramsar Site were recorded in flight at Ardleigh Reservoir. Cormorant is a species which makes part of a waterbird assemblage on the SPA designation, and was recorded in flight, however the times were insignificant and as such collision risk impact has been screened out of the Habitat Regulations Assessment (HRA) for this site. Collision risk and potential mortality in the absence of mitigation is considered to be a negligible effect in the medium term which is non-significant. Precautionary mitigation in the form of bird diverters is proposed between pylons TB15 and TB16 at Ardleigh Reservoir due to the highest number of target birds being noted here and RG87 and RG88 at the River Waveney where the Waveney and Little Ouse Recovery (WaLOR) Project is proposed for this area in which a restoration and enhancement program for the river catchment areas would be delivered. The habitats are therefore likely to become more suitable for waterbirds in the future and therefore precautionary mitigation measures have been implemented. |
| 2.9.5 | The applicant will need to consider whether the proposed line will cause such problems at any point along its length and take this into consideration in the preparation of the ES (see Section 4.3 of EN-1). | See response to 2.9.4. |
| 2.9.6 | Particular consideration should be given to feeding and hunting grounds, migration corridors and breeding grounds, where they are functionally linked to sites designated or allocated under the 'national site network' provisions of the Conservation of Habitats and Species Regulations~~.~~ and Conservation of Offshore Marine Habitats and Species Regulations. | The full assessment of the impacts and related mitigation measures are detailed in **ES Chapter 8: Ecology and Biodiversity [AS-026]** submitted as part of this DCO application. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | **Landscape and Visual Impact** | |
| 2.9.7 | While the government does not believe that the development of overhead lines is incompatible in principle with applicants' statutory duty under Schedule 9 to the Electricity Act 1989, to have regard to visual and landscape amenity and to reasonably mitigate possible impacts thereon, in practice new overhead lines can give rise to adverse landscape and visual impacts. | Details on the environmental effects of the different options can be found in **ES Chapter 3: Alternatives [APP-127]** and **Design Development Report [APP-122]**.<br>The **Outline LEMP [AS-046]** contains details of planting to help mitigate landscape and visual effects, including reinstatement planting and planting around CSE compounds and substations/substation extensions. The residual landscape and visual effects are set out in **ES Chapter 13: Landscape and Visual [APP-226], ES Appendix 13.2: Landscape Baseline and Assessment [APP-228] and ES Appendix 13.3: Visual Baseline and Assessment [APP-229 to APP-232].** Throughout the design process measures have been taken to reduce the landscape and visual effects of the Project as far as practicable.<br>The landscape and visual amenity assessments indicate that the construction phases would result in significant negative landscape and visual amenity effects. These significant effects are related to the introduction of construction activity and equipment, including the loss of some landscape features including farmland and field boundary vegetation. At Year 15 of operation, following the maturation of mitigation planting within Environmental Areas, the assessment concludes that significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure Projects, as set out in Paragraphs 5.10.5 and 5.10.13 of NPS EN-1. |
| 2.9.8 | These impacts depend on the type (for example, whether lines are supported by towers or monopole structures), scale, siting, and degree of screening of the lines, as well as the characteristics of the landscape and local environment through which they are routed. | |
| 2.9.9 | New substations, sealing end compounds (including terminal towers), and other above-ground installations that serve as connection, switching, and voltage transformation points on the electricity network may also give rise to adverse landscape and visual impacts. | |
| 2.9.10 | Cumulative adverse landscape, seascape and visual impacts may arise where new overhead lines are required along with other related developments such as substations, wind farms, and/or other new sources of generation. | |
| 2.9.11 | Landscape and visual benefits may arise through the reconfiguration, rationalisation, or undergrounding of existing electricity network infrastructure. Though mitigation of the landscape and visual impacts arising from | The Project includes some rationalisation and undergrounding of the existing electricity network infrastructure, as set out in **ES Chapter 4: Project Description [APP-130]**. Rationalisation and undergrounding have helped to mitigate landscape and visual |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | overhead lines and their associated infrastructure is usually possible, it may not always be so, and the impossibility of full mitigation in these cases does not countermand the need for overhead lines. | effects in some areas, as set out in **ES Chapter 13: Landscape and Visual [APP-226].** Residual landscape and visual effects are set out in **ES Appendix 13.2: Landscape Baseline and Assessment [APP-228] and ES Appendix 13.3: Visual Baseline and Assessment [APP-229 to APP-232].**<br>The Applicant has set out how the mitigation hierarchy has been applied to the Project in **6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-145]** and other Application documents including the **Planning Statement [APP-085]**.<br>Whilst compensation is part of the mitigation hierarchy, EN-1 or EN-5 do not state that all residual effects must be compensated for or that any compensation measure proposed must be accepted if there are residual effects. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of NPS EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects.<br>NPS EN-5 (2024) paragraph 2.9.11 is also explicit that mitigation is not expected to result in the removal of landscape and visual effects for overhead lines *'and the impossibility of full mitigation in these cases does not countermand the need for overhead lines'.*<br>It is particularly noteworthy that none of the policies on landscape and visual effects in EN-1 or EN-5 expressly mention compensation. This is in contrast to the other NPS policy sections e.g. on biodiversity, where the provision of compensation is expressly referred to.<br><br>The residual landscape and visual effects that remain following the application of the mitigation hierarchy therefore fall to the planning balance in accordance with the EN-1 and EN-5 policy |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | framework, including the further CNP presumption in section 4.2 of EN-1.<br>The NPS position in relation to compensation (as set out above) is also consistent with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regs). There is no requirement under the said Regulations for all residual effects to be compensated. |
| 2.9.12 | However, in nationally designated landscapes (~~for instance,~~ National Parks, The Broads and ~~Areas of Outstanding Natural Beauty~~National Landscapes) even residual impacts may ~~well~~ make an overhead line proposal unacceptable in planning terms~~. (See Section~~ (see paragraph 2.9.~~20~~21 below for guidance on this case~~.))~~. | The Project would pass through Dedham Vale National Landscape. Undergrounding is proposed in the Dedham Vale National Landscape and part of its setting. The setting of the National Landscape is identified in **ES Appendix 13.5: National Landscape Assessment Study, Annex A: Dedham Vale National Landscape Setting Study [APP-235]**. |
| 2.9.13 | Where possible, applicants should ensure that the principles detailed in ~~Sections~~paragraphs 2.~~11~~9.16-2.~~11~~9.19 below are embodied in the design of their proposed overhead line route and its associated infrastructure. Applicants should also offer proposals (for instance those detailed in Section 2.10 below) for additional mitigation. | Chapter 7 of the **Planning Statement [APP-085]** sets out how planning policy, namely EN-1 and EN-5. **ES Chapter 3: Alternatives [APP-127]**, the Design and Access Statement **[APP-353]**, **Design Approach to Site Specific Infrastructure [APP-354] and Design Development Report [APP-122]** describe how the principles of the Holford and Horlock Rules have influenced the options appraisal process demonstrating how such policy objectives have been embedded into the design of the Project. |
| 2.9.14 | Where the nature or proposed route of an overhead line will likely result in particularly significant landscape and visual impacts, as would be assessed through seascape, landscape~~, seascape~~ and visual impact assessment~~,~~ (SLVIA), the applicant should demonstrate that they have given due consideration to the costs and benefits of feasible alternatives to the overhead line. This could include~~ –~~, where appropriate ~~– re-routing~~re-routing, underground or subsea cables and the feasibility e.g. in | EN-5 requires the Applicant to operate in an efficient, coordinated and economical. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes.<br>In response to the relevant EN-5 paragraphs - 2.9.14 and 2.9.23 to 2.9.25 - the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | cost, engineering or environmental terms of these. Applicants should note the policy position ~~on~~for nationally designated landscapes at ~~section~~paragraph 2.9.~~20~~21 below. | high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts.<br>In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in **5.15 Design Development Report [APP-122]** and **5.6 Planning Statement [APP-085]**. The Project has therefore complied with the relevant EN-5 policies on undergrounding.<br>As part of its options appraisal process, National Grid considered whether the use of underground cables, rather than overhead lines, was an appropriate approach in the context of national policy and National Grid's various statutory duties.<br>The Landscape and Visual Impact Assessment (LVIA), included in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**, has been undertaken as part of the EIA. The approach to the LVIA follows professional guidance as set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** which includes Guidelines for Landscape and Visual Impact Assessment (GLVIA3)[1].<br>The assessment of landscape effects considers effects on landscape character and is reported in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**.<br>The assessment of visual effects considers effects on the visual amenity of people and is presented in **6.13.A3 Environmental** |

[1] Landscape Institute and Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment, Third Edition

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | **Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**.<br>The LVIA recognises that there will be significant landscape and visual effects of the Project during its construction and operation (and maintenance).<br>Mitigation measures of relevance to landscape and visual effects are summarised in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**.<br>Undergrounding is proposed in four locations, including through the Dedham Vale National Landscape and part of its setting. The Dedham Vale National Landscape is a nationally important and designated landscape. With the proposed underground cable, the effects on views and setting would be reduced.<br>The other areas of undergrounding are:<br>• Great Horkesley due to the potential effects of OHL on the Dedham Vale National Landscape;<br>• Fairstead to cross the existing 400 kV overhead line; and<br>• Existing YYJ route into the proposed new Tilbury North Substation to reduce effect on housing proposals by less direct land take and technical reasons that avoids outage interface with wider network.<br>Where the effects arising from standard lattice pylons are inconsistent with policy and National Grid's duties, the mitigation hierarchy is applied. The mitigation hierarchy sequentially considers localised specific mitigation measures, pylon position and routeing, low height pylons, T-pylons and the use of underground cables. Applied in this way National Grid can demonstrate compliance with it is duties under the Electricity Act and be assured the Project will be funded.<br>~~6.1.29~~The context and implications of undergrounding in areas outside nationally designated landscapes have been carefully |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | taken into consideration and appraised. Due regard to the costs, benefits/disbenefits and feasibility of undergrounding to overhead line in areas outside the nationally designated landscape has been backchecked and reviewed throughout the 'design evolution' process with the final position, set out in the **2025 Design Development Report [APP-122]**. |
| 2.9.15 | The ES should set out details of this consideration, including the applicant's rationale for eschewing feasible alternatives to the overhead line, and the mitigation cost-calculation methodology that this rationale may rely upon. | The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. The **Design Development Report [APP-122], Design and Access Statement [APP-353] and Design Approach for Site Specific Infrastructure [APP-354]** present the different choices made during the design process. These documents should be read alongside both **ES Chapter 3: Alternatives [APP-127],** which documents the key environmental factors in consideration of the main alternatives, and **ES Chapter 13: Landscape and Visual [APP-226].** |
| 2.9.16 | The Holford Rules ~~—~~(guidelines for the routing of new overhead lines~~—~~) were originally set out in 1959. These guidelines, intended as a common-sense approach to overhead line route design, were reviewed and updated by the industry in the 1990s, and they should be embodied in the applicants' proposals for new overhead lines. | National Grid recognise that the Holford Rules and their accompanying notes form the basis for the approach to routeing new 400 kV overhead lines. The Holford Rules have been used when considering alternatives and the need for any additional mitigation measures. The iterative design and assessment of the Project has applied the Holford Rules. |
| 2.9.17 | In brief, the Holford Rules state that applicants should:<br>• ~~avoid~~Avoid altogether, if possible, the major areas of highest amenity value, by so planning the general route of the line in the first place, even if total mileage is somewhat increased in consequence;<br>• ~~avoid~~Avoid smaller areas of high amenity value or scientific interest by deviation, provided this can be done without using too many angle towers, i.e. the | Further details on the environmental effects of the different route corridors and alignments can be found in **ES Chapter 3: Alternatives [APP-127] The Design Development Report [APP-122]**, **Planning Statement [APP-085] Design and Access Statement [APP-353]** and **Design ~~Appraisal~~ Approach for Site Specific Infrastructure [APP-354]** set out how the Project has taken the Holford and Horlock Rules into account. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | bigger structures which are used when lines change direction;<br>• ~~other~~Other things being equal, choose the most direct line, with no sharp changes of direction and thus with fewer angle towers;<br>• ~~choose~~Choose tree and hill backgrounds in preference to sky backgrounds wherever possible. When a line has to cross a ridge, secure this opaque background as long as possible, cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees;<br>• ~~prefer~~Prefer moderately open valleys with medium or moderate levels of tree cover where the apparent height of towers will be reduced, and views of the line will be broken by trees;<br>• ~~where~~Where country is flat and sparsely planted, and unless specifically preferred otherwise by relevant stakeholders, keep the high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables, so as to avoid a concentration of lines or 'wirescape'; and<br>• ~~approach~~Approach urban areas through industrial zones, where they exist; and when pleasant residential and recreational land intervenes between the approach line and the substation, carefully assess the comparative costs of undergrounding. | |
| 2.9.18 | The Horlock Rules ~~—~~(guidelines for the design and siting of substations~~—~~) were established by National Grid in 2009 in pursuance of its duties under Schedule 9 to the Electricity Act 1989. These principles should be embodied | National Grid devised the Horlock Rules (National Grid, 2009). The Horlock Rules provide guidelines for the siting and design of new substations, or substation extensions, to avoid or reduce the environmental effects of such developments. They also concern |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | in applicants' proposals for the infrastructure associated with new overhead lines. | the siting of CSE compounds and line entries. In summary, like the Holford Rules, they facilitate the consideration of environmental factors and amenity within the design and siting of new substation infrastructure.<br>The Horlock Rules were considered during the identification of potential locations for proposed new substations at EACN, Tilbury North and the CSE compounds and line entries. **ES Chapter 3: Alternatives [APP-127]** and an assessment of the Project against the Holford Rules is set out in **The Design Development Report [APP-122], Planning Statement [APP-085] Design and Access Statement [APP-353] and Design Approach for Site Specific Infrastructure [APP-354]** set out how the Project has taken the Holford and Horlock Rules into account. |
| 2.9.19 | In brief, the Horlock Rules state that applicants should:<br>• ~~consider~~Consider environmental issues from the earliest stage to balance the technical benefits and capital cost requirements for new developments against the consequential environmental effects in order to keep adverse effects to a reasonably practicable minimum~~.~~;<br>• ~~seek~~Seek to avoid altogether internationally and nationally designated areas of the highest amenity, cultural or scientific value by the overall planning of the system connections~~.~~;<br>• ~~protect~~protect as far as reasonably practicable areas of Protect as far as reasonably practicable areas of local amenity value, important existing habitats and landscape features including ancient ~~woodland~~woodland23, historic hedgerows, surface and ground water sources and nature conservation areas~~.~~;<br>• ~~take~~Take advantage of the screening provided by land form and existing features and the potential use of site layout and levels to keep intrusion into surrounding areas to a reasonably practicable minimum~~.~~;<br>• ~~keep~~Keep the visual, noise and other environmental effects to a reasonably practicable minimum~~.~~;<br>• ~~consider~~Consider the land use effects of the proposal when planning the siting of substations or extensions~~.~~;<br>• ~~consider~~Consider the options available for terminal towers, equipment, buildings and ancillary development appropriate to individual locations, | |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
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| | seeking to keep effects to a reasonably practicable minimum~~.~~;<br>• ~~use~~Use space effectively to limit the area required for development consistent with appropriate mitigation measures and to minimise the adverse effects on existing land use and rights of way, whilst also having regard to future extension of the substation~~.~~;<br>• ~~make~~Make the design of access roads, perimeter fencing, earth- shaping, planting and ancillary development an integral part of the site layout and design, so as to fit in with the surroundings~~.~~;<br>• ~~in~~In open landscape especially, high voltage line entries should be kept, as far as possible, visually separate from low voltage lines and other overhead lines so as to avoid a confusing appearance~~.~~;<br>• ~~study~~Study the inter-relationship between towers and substation structures and background and foreground features so as to reduce the prominence of structures from main viewpoints. Where practicable the exposure of terminal towers on prominent ridges should be minimised by siting towers against a background of trees rather than open skylines. | |
| 2.9.20 | NESO will consult on and publish Electricity Transmission Design Principles (ETDP), which will apply to onshore and offshore electricity transmission infrastructure. The ETDP will provide guidance on transmission technology choices available to mitigate the impact of transmission infrastructure on the landscape, environment and communities whilst embedding innovation into design. Once the ETDP is published, developers should have | The NESO Electricity Transmission Design Principles (ETDPs) were developed in response to the Government's Transmission Acceleration Action Plan (TAAP) to give designers, National Grid and decision makers clear consistent guidance of why types of transmission solution are expected in different environments, and to speed up delivery by resolving generic design questions. The ETDPs were published for consultation in September 2025 but the final version has not yet been published by NESO. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | regard to the ETDP as relevant, in addition to the Holford and Horlock rules. | Footnote 24 in EN-5 (2026) confirms any project that has been through the strategic planning stage before the ETDP are published will not be expected to have had regard to them.<br>They sit alongside the Holford/Horlock rules and the Energy National Policy Statements but are intended to give more practical, location-sensitive guidance.<br>The **Planning Statement [APP-085]** at Table 2.4 states that the current NPS EN-1 (2024) came into effect prior to any reference to ETDPs. It notes that the NPS EN-1 (2025) that was recently consulted upon refers to ETDPs and confirms that '*projects that have been through the front-end design stage prior to the Principles being published will not be expected to have regard to them'*. This applies to this Project. However, 'good design' has been considered as part of the development of this Project, as detailed within the **Design and Access Statement [APP-353]**'.<br>The above position does not change and has been re-affirmed through footnote 24 in NPS EN-5 (2026). |
| | **Undergrounding and subsea cables** | |
| 2.9.~~20~~21 | Although it is the government's position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, The Broads, or ~~Area of Outstanding Natural Beauty).~~National Landscape). | EN-5 requires the Applicant to operate in an efficient, coordinated and economical. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes.<br>In response to the relevant EN-5 paragraphs - 2.9.14 and 2.9.23 to 2.9.25 - the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. |
| 2.9.~~21~~22 | In these areas, and where harm to the landscape, visual amenity and natural beauty (including their special qualities and key characteristics) of these areas cannot feasibly be avoided by ~~reroutingre-~~ routing overhead lines, the strong starting presumption will be that the applicant should underground the relevant section of the line. | |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 2.9.~~22~~23 | However, undergrounding will not be required where it is infeasible in engineering terms, or where the harm that it causes (see ~~section~~paragraph 2.11.4) is not outweighed by its corresponding landscape, visual amenity and natural beauty benefits. Regardless of the option, the scheme through its design, delivery, and operation, should seek to further the statutory purposes of the designated landscape. These enhancements may go beyond the mitigation measures needed to minimise the adverse effects of the scheme. | In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in **5.15 Design Development Report [APP-122]** and **5.6 Planning Statement [APP-085]**. The Project has therefore complied with the relevant EN-5 policies on undergrounding.<br><br>No overhead lines are proposed within the Dedham Vale National Landscape.<br><br>Approximately 16.8 km of underground cable is proposed in Section C of which 5.7 km would be through the National Landscape designation. **ES Appendix 13.5: National Landscape Assessment Study [APP-235]** describes the effects of the Project on Dedham Vale National Landscape during construction and operation. The inclusion of '*including their special qualities and key characteristics*'' into the policy wording does not change the approach taken within the landscape and visual impact assessment.<br><br>The Project would be undergrounded through Dedham Vale National Landscape and adjacent landscapes. A CSE compound would be located to the east of Raydon Great Wood, approximately 2 km to the north-east of the National Landscape at its closest point. The Project would then transition back to overhead line, heading north away from the National Landscape. To the south-east of Dedham Vale National Landscape, the underground cable route would continue outside the National Landscape and terminate at a new substation known as the EACN Substation, approximately 1.3 km south of the National Landscape. The Project would run on overhead line between the EACN Substation and Great Horkesley to the west. A further |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | section of undergrounding is proposed to the south-west of the National Landscape at Great Horkesley, where the Project is within the setting of the National Landscape (see **ES Appendix 13.5: National Landscape Assessment Study [APP-235]**). The CSE compounds are located approximately 1.3 km to the south of the National Landscape at both ends of this underground section. The Project would then transition back to overhead line, before heading south away from the National Landscape. |
| 2.9.~~23~~24 | Additionally, cases will arise where—, though no part of the proposed development crosses a designated landscape—, a high potential for widespread and significant adverse landscape and/or visual impacts along certain sections of its route may result in recommendations to use undergrounding for relevant segments of the line or alternatively consideration of using a route including subsea cabling. | NPS EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way[2]. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes.<br>In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts.<br>In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in **5.15 Design Development Report [APP-122]** and **5.6 Planning Statement [APP-085]**. The Project has therefore complied with the relevant EN-5 policies on undergrounding. |

[2] Electricity Act 1989, Section 9

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | Undergrounding was considered appropriate in parts of the setting of the Dedham Vale National Landscape (within Sections C and D), as well as within the National Landscape itself. The setting of the National Landscape is identified in ES **Appendix 13.5: National Landscape Assessment Study, Annex A: Dedham Vale National Landscape Setting Study [APP-235]**.<br>Undergrounding is proposed in four locations, including through the Dedham Vale National Landscape and part of its setting. The Dedham Vale National Landscape is a nationally important and designated landscape. With the proposed underground cable, the effects on views and setting would be reduced.<br>The other areas of undergrounding include:<br>• Great Horkesley due to the potential effects of OHL on the Dedham Vale National Landscape;<br>• Fairstead to cross the existing 400 kV overhead line; and<br>• Existing YYJ route into the proposed new Tilbury North Substation to reduce effect on housing proposals by less direct land take and technical reasons that avoids outage interface with wider network.<br>Hence, adopting the case-by-case approach to undergrounding and a consistent Project approach to undergrounding, the extent of undergrounding proposed is considered appropriate. |
| 2.9.~~24~~25 | In these cases, and taking account of the fact that the government has not laid down any further rule on the circumstances requiring use of underground or subsea cables, the Secretary of State must weigh the feasibility, cost, and any harm of the undergrounding or subsea option against:<br>• ~~the~~The adverse implications of the overhead line proposal; | Overhead lines are normally less disruptive to construct than underground cables, for example they can pass over the top of sensitive features such as rivers, hedgerows and tree belts with relatively little disturbance to habitats. They are also cheaper to install and easier to maintain, whilst allowing the land to be reinstated more quickly than underground cables. Overhead lines require a much smaller footprint (limited to pylon bases, and any temporary construction land such as access routes and construction areas). Therefore, they are typically of lower impact |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | • ~~the~~The cost and feasibility of re-routing overhead lines or mitigation proposals for the relevant line section; and<br>• ~~the~~The cost and feasibility of the reconfiguration, rationalisation, and/or use of underground or subsea cabling of proximate existing or proposed electricity networks infrastructure. | on ground features such as ecology, archaeology, drainage and groundwater flows. Overhead lines are easy to inspect, repair and maintain, as works can be undertaken to the above ground components with little disturbance to land use. However, overhead lines can have a visual impact, particularly in areas of high landscape value.<br>Underground cables by comparison, have higher construction costs compared to overhead lines. In addition, the cost of loss of service and that of repairs is greater for cables because the faulted section of cable needs to be excavated to allow for repairs.<br>Furthermore, National Grid holds the Transmission Licence for England and Wales and is, therefore, regulated by Ofgem, the electricity and gas markets regulator, to ensure value for money for consumers and is required under the Electricity Act to 'develop and maintain an efficient, coordinated and economical electricity transmission system, and to facilitate competition in supply and generation of electricity.' These duties and obligations mean that National Grid has a responsibility to deliver new electricity transmission infrastructure but also to be responsible for the cost of Projects as costs will ultimately be borne by electricity users. Overall, National Grid is confident that the Project strikes the appropriate balance of overhead line and underground cables. |
| 2.9.~~25~~26 | In such cases the Secretary of State should only grant development consent for underground or subsea sections of a proposed line over an overhead alternative if they are satisfied that the benefits accruing from the former proposal clearly outweigh any extra economic, social, or environmental impacts that it presents, the mitigation hierarchy has been followed, and that any technical obstacles associated with it are surmountable. In this context it should consider: | The cost of, and scope for, developing outside the National Landscape or meeting the need in some other way has been considered as part of the evolution of the Project. **ES Chapter 3: Alternatives [APP-127]** describes the routeing decision made by National Grid to route directly through the Dedham Vale National Landscape (using underground cables) or take a longer route around it. The direct route with underground cables was selected as it halves the connection length, avoids creating a third connection between Bramford and Twinstead, and better |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | • ~~the~~The landscape and visual baseline characteristics of the setting of the proposed route, in particular, the impact on high sensitivity visual receptors (as defined in the current edition of the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment), residential areas, designated landscapes, valued landscapes, designated heritage assets and Heritage Coasts (including, where relevant, impacts on the setting of designated features and areas), noting the policy in EN-1 ~~section~~paragraphs 5.4.~~53~~13 – 5.4.14 on regional and local designations;<br>• ~~the~~The additional cost of the proposed underground or sub-sea alternatives, including their significantly higher lifetime cost of repair and later uprating;<br>• ~~the~~The potentially very disruptive effects of undergrounding on local communities, habitats, archaeological and heritage assets, marine environments, soil (including peat soils), hydrology, geology, and, for a substantial time after construction, landscape and visual amenity. (Undergrounding an overhead line will mean digging a trench along the length of the route, and so such works will often be more disruptive – albeit temporarily – to the receptors listed above than would an overhead line of equivalent rating);<br>• ~~the~~The potentially very disruptive effects of subsea cables on the seabed and the species that live in and on it, including physical damage to and full loss of seabed habitats. Cable protection can also be required where cables cross each other, or where they cannot be buried deep enough to protect them from becoming exposed. Such protection causes additional impacts | complies with the Holford Rules, despite requiring underground cable mitigation through the National Landscape.<br>Landscape and visual effects are considered in **ES Chapter 13: Landscape and Visual [APP-226] and ES Appendix 13.5: National Landscape Assessment Study, Annex A: Dedham Vale National Landscape Setting Study [APP-235].**<br>Ecological and Biodiversity effects are considered in **ES Chapter 8: Ecology and Biodiversity [AS-026].** Impacts on Habitats are set out in in **ES Appendix 8.1: Habitat Report [AS-028]**.<br>Impacts on archaeology and heritage assets are set out in **ES Chapter 11: Historic Environment [AS-068], ES Appendix 11.2: Historic Environment Assessment Tables [AS-070], ES Appendix 11.4: Geophysical Survey Results Report [AS-072 – AS-077], ES Appendix 11.5: Trial Trenching Results Report [AS-078], ES Appendix 11.6: Geoarchaeological and Archaeological Monitoring of Ground Investigation Works Report [APP-214] and ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets [APP-215].**<br>Community impacts are considered in **ES Chapter 15: Socio-economics, Recreation and Tourism [APP-265]**.<br>Impacts on soils and agriculture are considered in **ES Chapter 6: Agriculture and Soils [APP-138]**. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | that are often greater than those of the cable itself due to the large areas covered. There can also be issues where subsea cables make landfall, as much coastal land is protected habitat with environmental and heritage designations and landfall connections could cause additional disruption to coastal communities and the environment;<br>• ~~the~~The applicant's commitment, as set out in their ES, to mitigate the potential detrimental effects of undergrounding works on any relevant agricultural land and soils (including peat soils), particularly regarding Best and Most Versatile land, including development and implementation of a Soil Resources and Management Plan. Such a commitment must guarantee appropriate handling of soil, backfilling, and return of the land to the baseline Agricultural Land Classification (ALC), thus ensuring no loss or degradation of agricultural land. Such a commitment should be based on soil and ALC surveys in line with the 1988 ALC criteria and due consideration of the Defra Construction Code of Practice for Sustainable Use of Soils on Construction Sites. | |
| | **Noise and Vibration** | |
| 2.9.~~26~~27 | All high voltage transmission lines have the potential to generate noise under certain conditions. | Operational noise from overhead lines is scoped out of the **ES, in accordance with the Scoping Opinion [APP-297]**, on the basis that a low noise conductor system is proposed. However, information on noise from overhead lines is provided in **ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) [APP-261].** |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 2.9.~~37~~38 and 2.9.~~38~~39 | Audible noise effects can also arise from substation equipment such as transformers, quadrature boosters and mechanically switched capacitors.<br>Transformers are installed at many substations, and generate low frequency hum. Whether the noise can be heard outside a substation depends on a number of factors, including transformer type and the level of noise attenuation present (either engineered intentionally or provided by other structures). | **ES Chapter 14: Noise and Vibration [APP-256]** details the likely significant effects associated with construction noise and vibration, construction traffic noise, operational noise from the proposed EACN Substation and Tilbury North Substation and operational vibration. Operational traffic noise and operational noise from overhead lines and underground cables have not been assessed due to the likely low level noise generation from these aspects of the Project.<br>The assessment of operation noise is presented in E**S Appendix 14.3: EACN Substation Operational Noise Assessment [APP-259] and ES Appendix 14.4: Tilbury North Substation Operational Noise Assessment [APP-260].**<br>With embedded and standard mitigation measures, the impact of operational noise from the proposed substations on all nearby NSR, has been assessed as having a negligible or small magnitude impact, during both daytime and night-time periods, taking account of context. This would result in a residual negligible to minor adverse effect at all nearby NSR, which is considered to be not significant.<br>The assessment is indicative for the purpose of demonstrating that significant adverse effects can be avoided. The assessment is based on early design information and standard noise mitigation measures. Further detailed design would be undertaken by the developers, including consideration of specific noise mitigation measures. |
| 2.9.~~40~~41 | For the assessment of noise from overhead lines, the applicant must use an appropriate method to determine the sound level produced by the line in both dry and wet weather conditions, in addition to assessing the impact on noise-sensitive receptors. | See response to 2.9.26. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 2.9.~~41~~42 | For instance, the applicant may use an appropriate noise modelling tool or tools for the prediction of overhead line noise and its propagation over distance, such as an ISO 9613-2 or Technical Report TR(T)94. | Technical Report TR(T)94 has been withdrawn by National Grid and is superseded by National Grid document PS(T)134 Operational Audible Noise Policy for Overhead Lines (new build, reconductoring, diversion and uprating). The assessment in **ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) [APP-261]** follows the guidance presented in PS(T)134 and the overhead line noise prediction model in EFC-400 follows ISO 9613-2. |
| 2.9.~~42~~43 | When assessing the impact of noise generated by overhead lines in wet weather relative to existing background sound levels, the applicant should consider the effect of varying background sound levels due to rainfall. | See response to 2.9.26. |
| 2.9.~~43~~44 | The Secretary of State is likely to regard it as acceptable for the applicant to use a methodology that demonstrably addresses these criteria. | See response to 2.9.26. |
| | **Electric and Magnetic Fields (EMFs)** | |
| 2.9.~~46~~47 | All overhead power lines produce EMFs. These tend to be highest directly under a line and decrease to the sides at increasing distance. Although putting cables underground eliminates the electric field, they still produce magnetic fields, which are highest directly above the cable. EMFs can have both direct and indirect effects on human health, aquatic and terrestrial organisms. | Noted and discussed in Sections 1 and 2 of the **Electric and Magnetic Field Compliance Report [APP-330]**. |
| 2.9.~~47~~48 | The direct effects occur in terms of impacts on the central nervous system resulting in its normal functioning being affected. Indirect effects occur through electric charges building up on the surface of the body producing a microshock on contact with a grounded object, or vice versa, which, depending on the field strength and other | Both direct and indirect EMF effects of the Project have been assessed in the **Electric and Magnetic Field Compliance Report [APP-330]**. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | exposure factors, can range from barely perceptible to being an annoyance or even painful. | |
| 2.9.~~48~~49 | To prevent these known effects, the International Commission on Non-Ionizing Radiation Protection (ICNIRP) developed health protection guidelines in 1998 for both public and occupational exposure. These are expressed in terms of the induced current density in affected tissues of the body, 'basic restrictions', and in terms of measurable 'reference levels' of electric field strength (for electric fields), and magnetic flux density (for magnetic fields). The relationship between the (measurable) electric field strength or magnetic flux density and induced current density in body tissues requires complex dosimetric modelling. | The ICNIRP 1998 guidelines form the basis of the assessment of EMF for the Project. The Project is compliant with the ICNIRP 1998 guidelines as demonstrated in the **Electric and Magnetic Field Compliance Report [APP-330]**. |
| 2.9.~~49~~50 | The reference levels are such that compliance with them will ensure that the basic restrictions are not reached or exceeded. Exceeding the reference levels does not necessarily mean that the basic restrictions will not be met; this would be a trigger for further investigation into the specific circumstances. | Noted and this forms the basis of the EMF compliance assessment applied to the Project in the **Electric and Magnetic Field Compliance Report [APP-330]**. |
| 2.9.~~50~~51 | For protecting against indirect effects, the ICNIRP 2020 guidelines give an electric field reference of 5kV m-1 for the general public and keeping electric fields below this level would reduce the occurrence of adverse indirect effects for most individuals to acceptable levels. When this level is exceeded, there is a suite of measures that may be called upon in particular situations, including provision of information, earthing and screening, alongside limiting the field. In some situations, there may be no reasonable way of eliminating indirect effects. | The ICNIRP 2020 guidelines cover radio-frequency EMFs in the range of 100 kHz to 300 GHz. These provide no electric field reference levels at 50 Hz.<br>National Grid is unclear on the application of ICNIRP 2020 to EMF for electricity assets and are aiming to clarify this point with DESNZ. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 2.9.~~51~~52 | The levels of EMFs produced by power lines in normal operation are usually considerably lower than the ICNIRP 2020reference levels. For electricity substations, the EMFs close to the sites tend to be dictated by the overhead lines and cables entering the installation, not the equipment within the site. | The ICNIRP 2020 guidelines cover the frequency ranges 100 kHz to 300 GHz and are not applicable to 50 Hz power-frequencies. National Grid is unclear on the application of ICNIRP 2020 guidelines to EMF for electricity assets and are aiming to clarify this point with DESNZ. |
| 2.9.~~54~~55 | In March 2004, the National Radiological Protection Board (now part of NIHP CRCE), published advice on limiting public exposure to electromagnetic fields. The advice recommended the adoption in the UK of the EMF exposure guidelines published by ICNIRP in 2020. | Noted. In March 2004 the National Radiological Protection Board recommended the adoption of guidelines published by ICNIRP in 1998. It is the ICNIRP 1998 guidelines that have been applied to the **Electric and Magnetic Field Compliance Report [APP-330]**. The ICNIRP 2020 guidelines cover the frequency ranges 100 kHz to 300 GHz and are not applicable to 50 Hz power-frequencies. National Grid is unclear on the application of ICNIRP 2020 guidelines to EMF for electricity assets and are aiming to clarify this point with DESNZ. |
| 2.9.~~55~~56 | These guidelines also form the basis of the Control of Electromagnetic Fields at Work Regulations 2016. Resulting from these recommendations, government policy is that exposure of the public should comply with the ICNIRP (2020) guidelines. The electricity industry has agreed to follow this policy. Applications should show evidence of this compliance as specified in paragraphs 2.10.11. | The ICNIRP 2010 guidelines form the basis of 50 Hz component of the Control of Electromagnetic Fields at Work Regulations 2016.<br>ICNIRP 2020 guidelines cover radio-frequency exposures, which are not applicable to electricity infrastructure Projects of this nature.<br>National Grid is unclear on the application of the ICNIRP 2020 guidelines to EMF for electricity assets and are aiming to clarify this point with DESNZ |
| 2.9.~~57~~58 | The Department of Health and Social Care's Medicines and Healthcare Products Regulatory Agency does not consider that transmission line EMFs constitute a significant hazard to the operation of pacemakers. | This presents no change to current policy and was considered in Section 2.10 of the **Electric and Magnetic Field Compliance Report [APP-330]**. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | **Sulphur Hexafluoride** | |
| 2.9.~~61~~62 | Applicants should at the design phase of the process consider carefully whether the proposed development could be reconceived to avoid the use of SF6-reliant assets. | As outlined in **ES Appendix 4.1: Greenhouse Gas Assessment [APP-131]**, it is assumed that no SF6 equipment will be used in the Project, in accordance with National Grid policy. SF6 alternatives such as C4 or G3 have a 99% lower global warming potential (GWP) than SF6. |
| 2.9.~~62~~63 | Where the development cannot be so conceived, the applicant must provide evidence of their reasoning on this point. Such evidence will include, for instance, an explanation of the alternatives considered, and a case why these alternatives are technically infeasible or require bespoke components that are grossly disproportionate in terms of cost. | |
| 2.9.~~63~~64 | In particular, an accounting of the cost differential between the SF6- reliant asset and the appropriate SF6-free alternative should be provided. | |
| 2.9.~~64~~65 | Where applicants, having followed the above procedure, do propose to put new SF6-reliant assets onto the electricity system, they should design a plan for the monitoring and control of fugitive SF6 emissions consistent with the Fluorinated gas (F-gas) Regulation and its successors. | |
| **2.10** | **Mitigation** | |
| 2.10.1 | The applicant should consider and address routing and avoidance/minimisation of environmental impacts both onshore and offshore at an early stage in the development process | As outlined in **ES Appendix 4.1: Greenhouse Gas Assessment [APP-131]**, it is assumed that no SF6 equipment will be used in the Project, in accordance with National Grid policy. SF6 alternatives such as C4 or G3 have a 99% lower global warming potential (GWP) than SF6. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | **Biodiversity and Geological conservation** | |
| 2.10.3 | Making lines more visible by methods such as the fitting of bird flappers and diverters to the earth wire, which swivel in the wind, glow in the dark and use of fluorescent colours designed specifically for bird vision can also reduce the risk of bird collisions and number of potential deaths. The design and colour of the diverters will be specific to the conditions – the line and pylon/transmission tower specifications and the species at risk. | See response to 2.9.3. |
| 2.10.4 | Electrocution risks can be reduced through the design of lattice steel tower crossarms, insulators and the construction of other parts of high voltage power lines so that birds find no opportunity to perch near energised power lines on which they might electrocute themselves. | See response to 2.9.3. |
| | **Landscape and Visual** | |
| 2.10.5 | In addition to good design in accordance with the Holford and Horlock rules (please see paragraphs 2.9.16 - 2.9.19) and the ETDP once published (paragraph 2.9.20), and the consideration of undergrounding or rerouting the line where possible, the principal opportunities for mitigating adverse landscape and visual impacts of electricity networks infrastructure are:<br>• ~~consideration~~Consideration of network reinforcement options (where alternatives exist) which may allow improvements and/or extensions to an existing line rather than the building of an entirely new line;<br>• ~~selection~~Selection of the most suitable type and design of support structure in order to minimise the overall visual impact on the landscape. In particular, ensuring | Consideration of design for the Project, in accordance with the Holford and Horlock rules, is set out in **ES Chapter 3: Alternatives [APP-127], the Design Development Report [APP-122], Planning Statement [APP-085] Design and Access Statement [APP-353] and Design ~~Appraisal~~ Approach for Site Specific Infrastructure [APP-354].**<br>Embedded mitigation measures have been integral in reducing, and where possible, avoiding, the landscape and visual effects of the Project. Landscape and visual matters were considered in the early stages of siting and design. **ES Chapter 3: Alternatives [APP-127]** provides an overview of the design rationale for the Project. It explains how the Project has sought to avoid or reduce significant environmental effects, including landscape and visual effects, wherever practicable, from the initial option identification and selection stage up to the refinement of the Project in response to feedback, further assessments and design work. The |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | that towers are of the smallest possible footprint and internal volume; and<br>• ~~the~~The rationalisation, reconfiguration, and/or undergrounding of existing electricity networks infrastructure in the vicinity of the proposed development. | site selection process and consideration of alternatives are also summarised in **ES Chapter 3: Alternatives [APP-127]** which shows that a wide range of alternatives were considered in the design of the Project, taking into account the EIA process, ground investigations and feedback from consultees received from formal consultation exercises and Project meetings.<br>Relevant mitigation measures are set out in the **Outline CoCP [APP-300].**<br>New steel lattice pylons, (including low height pylons at Thurrock Airfield and Little Waltham) have been chosen as the preferred option to support the conductors (rather than T-pylons). Lattice pylons offer the advantage of thin steel members in in an open structure, making background features visible beyond, helping them to visually recede. Further technical characteristics of the Project are discussed in **ES Chapter 4: Project Description [APP-130].**<br>As noted at 2.9.20, the NESO Electricity Transmission Design Principles (ETDPs) were developed in response to the Government's Transmission Acceleration Action Plan (TAAP) to give designers, National Grid and decision makers clear consistent guidance of why types of transmission solution are expected in different environments, and to speed up delivery by resolving generic design questions. The ETDPs were published for consultation in September 2025 but the final version has not yet been published by NESO.<br>Footnote 24 in EN-5 (2026) confirms any project that has been through the strategic planning stage before the ETDP are published will not be expected to have had regard to them.<br>The **Planning Statement [APP-085]** at Table 2.4 states that the current NPS EN-1 (2024) came into effect prior to any reference to ETDPs. It notes that the revised NPS EN-1 (2025) that was recently consulted upon refers to ETDP and confirms that |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
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| | | ‘*projects that have been through the front-end design stage prior to the Principles being published will not be expected to have regard to them.* This applies to this Project. However, ‘good design’ has been considered as part of the development of this Project, as detailed within the **Design and Access Statement [APP-353]’.**<br>The above position does not change and has been re-affirmed through footnote 24 in NPS EN-5 (2026) |
| 2.10.6 | Additionally, there are more specific measures that might be taken, and which the Secretary of State could mandate through DCO requirements if appropriate, as follows:<br>• ~~landscape~~Landscaping schemes, comprising off-site tree and hedgerow planting, are sometimes used for larger new overhead line projects to mitigate potential landscape and visual impacts, softening the effect of a new above ground line whilst providing some screening from important visual receptors. These may be implemented with the agreement of the relevant landowner(s), or the developer may compulsorily acquire the land or land rights in question. Advice from the relevant statutory authority ~~may also be needed~~should be sought on the design of such schemes, with particular consideration given to the selection of species mix which is appropriate to the local landscape character; and<br>• ~~screening~~Screening, comprising localised planting in the immediate vicinity of residential properties and principal viewpoints can also help to screen or soften the effect of the line, reducing the visual impact from a particular receptor. | Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features as far as reasonably practicable. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse residual landscape and visual effects.<br>National Grid has also embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project.<br>Embedded mitigation measures relevant to landscape and visual amenity include:<br>Sensitive routeing and siting of the alignment and Order Limits - as far as practicable effects on identified environmental (including landscape and visual, ecology and heritage assets) and socio-economics receptors have been avoided and reduced. **ES Chapter 3: Alternatives [APP-127]** summarises the Project routeing and site selection process and consideration of alternatives.<br>Undergrounding is proposed in four locations, including through the Dedham Vale National Landscape and part of its setting. The Dedham Vale National Landscape is a nationally important and |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | designated landscape. With the proposed underground cable, the effects on views and setting will be reduced.<br>Prior to the commencement of construction works for the Project, several existing overhead and underground third-party services would need to be diverted, removed, undergrounded, or protected. The Project would follow the route of existing 132 kV overhead lines north of Flowton and north of Mellis, where the existing 132 kV overhead lines would be undergrounded. This would help to reduce landscape and visual effects.<br>The Project allows for the use of full line tension gantries at CSE compounds and substations (where design allows). The use of full tension gantries removes the need for a bulkier terminal pylon adjacent to the CSE compound which would reduce visual clutter and therefore help to reduce landscape and visual effects.<br>The Project allows for landscape planting around CSE compounds, the new EACN Substation, south of the new Tilbury North Substation and the existing Norwich Main Substation and its extension. These are presented as 'Environmental Areas' on E**S Figure 4.1: Proposed Project Design [APP-133] and ES Figure 4.2: Proposed Project Design – Permanent Features [APP-134]**. Further details including landscape plans and planting schedules are provided in the **Outline LEMP [AS-046].**<br>Replacement planting would be undertaken at the earliest opportunity given the right planting season to mitigate, where practicable, vegetation removed during construction.<br>National Grid have considered the proposed materials and colour palette for the CSE compounds and new substation / substation extension, including buildings, security fencing, equipment, and surfacing to be sensitive to the environment they are located in, where practicable. Further information is included in the **[APP-354]**. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | Indicative planting schedules are presented within the **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 detailed designs develop. The planting schedules have been developed to accompany the outline landscape proposals included in **Appendix D of the Outline LEMP [APP-325].** |
| 2.10.7 | As set out in the paragraphs above, where ~~landscape~~landscaping schemes and/or screening mitigation of the kind described above is required, rights over the land necessary for such measures may be compulsorily acquired as part of the DCO. | The Environmental Areas are located on land to be acquired by National Grid and any habitats included within the BNG onsite mitigation will be monitored and managed by National Grid for 30 years in line with commitments made within the **BNG Report [APP-299].** |
| 2.10.8 | Furthermore, since long-term management of the selected mitigation schemes is essential to their mitigating function, a management plan, developed at least in outline at the conclusion of the examination, and which sets out proposals within a realistic timescale, should secure the integrity and benefit of these schemes. This should also uphold the landscape commitments made to achieve consent, alongside any pertinent commitments to environmental and biodiversity net gain. | Areas of planting proposed for biodiversity net gain, as described in the **Biodiversity Net Gain Report [APP-299]** would be subject to a 30-year management plan. National Grid has also committed to a up to 30-year aftercare period for the mitigation planting. |
| | **Noise and vibration** | |
| 2.10.9 | Applicants must consider the following measures:<br>• the positioning of lines to help mitigate noise;<br>• ensuring that the appropriately sized conductor arrangement is used to minimise potential noise;<br>• quality assurance through manufacturing and transportation to avoid damage to overhead line conductors which can increase potential noise effects; | As per response to 2.9.27. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | • ensuring that conductors are kept clean and free of surface contaminants during stringing/installation; and<br>• the selection of quieter cost-effective plants. | |
| 2.10.10 | In addition, the ES should include information on planned maintenance arrangements. Where detail is not included, the Secretary of State should consider stipulating appropriate maintenance arrangements by way of requirements attached to any grant of development consent. | **ES Chapter ~~6.~~14: Noise and Vibration [APP-256]** considers noise generated by operational maintenance and concludes that operational maintenance is not expected to generate high levels of noise or vibration and would generally involve relatively short-term activities. |
| | **Electric and Magnetic Fields (EMFs)** | |
| 2.10.11 | The applicant should consider the following factors:<br>~~height~~Height, position, insulation and protection (electrical or mechanical as appropriate) measures subject to ensuring compliance with the Electricity Safety, Quality and Continuity Regulations 2002; ~~that~~That optimal phasing of high voltage overhead power lines is introduced wherever possible and practicable in accordance with the Code of Practice to minimise EMFs; andy~~any~~Any new advice emerging from the Department of Health and Social Care relating to government policy for EMF exposure guidelines. | **Sections 2.12 and 6.2 of the Electric and Magnetic Field Compliance Report [APP-330]** demonstrates that the Project has been designed to comply with the statutory requirements of the Electricity Safety, Quality and Continuity Regulations 2002 and that optimal phasing has been applied in accordance with the Codes of Practice.<br>National Grid are committed to following government policy on EMF exposure guidelines applying new advice when where appropriate. |
| 2.10.12 | Where it can be shown that the line will comply with the current public exposure guidelines and the policy on phasing, no further mitigation should be necessary. | The overhead line has been designed in compliance with the policy on optimum phasing as specified in the Code of Practice on Optimum Phasing, as demonstrated in the **Electric and Magnetic Field Compliance Report [APP-330]**. |
| 2.10.13 | Where EMF exposure is within the relevant public exposure guidelines, re-routeing a proposed overhead line purely on the basis of EMF exposure or undergrounding a line solely to further reduce the level of EMF exposure are unlikely to be proportionate mitigation measures. | The Project has been designed and assessed in line with the Code of Practice - Power Lines: Demonstrating compliance with EMF exposure guidelines. All the EMF produced comply with relevant public exposure guidelines provided by ICNIRP 1998 as demonstrated in the **Electric and Magnetic Field Compliance** |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | **Report [APP-330]**. National Grid considered these as the relevant public exposure guidelines as they cover power-frequency EMF exposures rather than radio frequencies EMFs covered by the ICNIRP 2020 guidance. No additional EMF mitigation has been applied. |
| | **Sulphur Hexafluoride** | |
| 2.10.14 | The climate-warming potential of SF6 is such that applicants should, as a rule, avoid the use of SF6 in new developments. | See the response to 2.9.62. |
| 2.10.15 | Where no proven SF6-free alternative is commercially available, and where the cost of procuring a bespoke alternative is grossly disproportionate, the continued use of SF6 is acceptable, provided that emissions monitoring and control measures compliant with the F-gas Regulation and/or its successors are in place. | See the response to 2.9.64. |
| **2.11** | **Secretary of State decision making** | |
| | **Impacts Biodiversity and Geological conservation** | |
| 2.11.1 | Where biodiversity impacts are identified, including those associated with bird collision with overhead lines, the Secretary of State should be satisfied that all feasible options for mitigation have been considered and evaluated appropriately. | As set out in **ES Chapter 8: Ecology and Biodiversity [AS-026]** the Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project.<br>There will be impacts on Habitats of Principal Importance e.g. arable field margins, lowland meadows, ponds, wet woodlands and hedgerows during the construction and operational phases. During the construction phase, habitats would be temporarily removed to create haul road, site compounds and storage areas. Habitats that are within the footprint of the permanent infrastructure that includes pylons CSE compounds and |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | substations will be permanently removed. The Habitats of Principal Importance that would be lost on a temporary basis would be reinstated in line with the habitat reinstatement principles set out in Chapter 9 of the **Outline LEMP [AS-046].**<br>Mitigation for the permanent loss of habitat, including habitats of principal importance and important hedgerows would be delivered through the creation / enhancement of habitat associated with the biodiversity net gain for the Project. Within the Order Limits six areas of land (defined as Environmental Areas) will be utilised around the Project's permanent assets, where there is sufficient space. To ensure the biodiversity net gain target is reached, any additional creation / enhancement will be delivered outside of the Order Limits, as identified in the **Biodiversity Net Gain Report [APP-299]**.<br>National Grid has embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project. Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features such as woodland as far as reasonably practicable. As set out in Chapter 6 of the **Outline LEMP [AS-046],** removal and manipulation of habitat known to support hazel dormouse would take place under licence to Natural England (the current licensing body). With details to be approved by Natural England. Vegetation removal will be overseen by the licensed ecologists with removal staged to enable vegetation to be searched for individual dormice before it is cut to ground level, with further searches to confirm the absence of hazel dormouse before stumps are moved and the area identified as 'free' of constraints. Nest boxes will be installed in areas of retained vegetation to mitigate for the loss of natural nest sites. Following |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | the implementation of mitigation measures identified in the **Outline CoCP [APP-300]**, no residual significant adverse effects on roosting, foraging or commuting bats, Schedule 1 birds or wintering passage birds, reptiles, otter, water vole, badger or species of principal importance are identified. No significant effects on above species have been identified during the operational phase.<br>As set out in **7.4 Outline Landscape and Ecological Management Plan [AS-046]**, as a mitigation measure the Project will provide dormouse boxes in areas where hazel dormouse has been confirmed to be present, bat boxes in areas where bat roosts are confirmed and bird boxes where replacement features are required. Fencing is to be used during construction and for security reasons around permanent infrastructure. During construction, this fencing will be permeable to wildlife where there is no risk of harm. For example wildlife will be able to cross most areas of the construction site. Fencing that is not permeable to wildlife will be used for the safety of animals. For example impermeable fencing will be installed around active compounds where materials are to be stored. This fencing will not be permeable to animals to avoid the risk of harm. Other measures required to safeguard flora and fauna are set out in **7.2 Outline Code of Construction Practice [APP-300]**. As set out in **7.4 Outline Landscape and Ecological Management Plan [AS-046]** brash and timber material generated by site clearance are to be used to create wildlife habitat in areas of retained vegetation. |
| | **Landscape and Visual** | |
| 2.11.2 | The Secretary of State should be satisfied that the development, so far as is reasonably possible, complies with the Holford and Horlock Rules (please see paragraphs 2.9.16 - 2.9.19) or any updates to them~~.~~ and | The **Design Development Report [APP-122], the Design and Access Statement [APP-353] and the Design Approach to Site Specific Infrastructure [APP-354]** describe how the Holford and Horlock Rules, have influenced the optioneering and design evolution process, demonstrating how such policy and legislative |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | has had regard to the ETDP (please see paragraph 2.9.20) once published. | objectives have been embedded into the design of the Project. Both sets of rules have been deployed by National Grid and have formed an important part of developing the preferred route and design of the Project. For example, the route seeks to avoid siting infrastructure in areas with significant amenity value; the most direct route is preferred to avoid the need for additional angle pylons; siting infrastructure in areas benefiting from existing advantageous vegetation screening is preferred; and densely populated urban/residential areas are avoided, where possible.<br>As noted at 2.9.20, the NESO Electricity Transmission Design Principles (ETDPs) were developed in response to the Government's Transmission Acceleration Action Plan (TAAP) to give designers, National Grid and decision makers clear consistent guidance of why types of transmission solution are expected in different environments, and to speed up delivery by resolving generic design questions. The ETDP were published for consultation in September 2025 but the final version has not yet been published by NESO.<br>Footnote 24 in EN-5 (2026) confirms any project that has been through the strategic planning stage before the ETDP are published will not be expected to have had regard to them.<br>The **Planning Statement [APP-085]** at Table 2.4 states that the current NPS EN-1 (2024) came into effect prior to any reference to ETDPs. It notes that the revised NPS EN-1 (2025) that was recently consulted upon refers to ETDP and confirms that '*projects that have been through the front-end design stage prior to the Principles being published will not be expected to have regard to them'.* This applies to this Project. However, 'good design' has been considered as part of the development of this Project, as detailed within the **Design and Access Statement [APP-353]'.** |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | The above position does not change and has been re-affirmed through footnote 24 in NPS EN-5 (2026). |
| 2.11.3 | The Secretary of State should also be satisfied that all feasible options for mitigation – including the rationalisation, reconfiguration, or undergrounding of existing electricity networks infrastructure, have been considered and evaluated appropriately. | Once the need for the Project was established, National Grid considered the different ways in which this need could be met, to generate a preferred strategic proposal. The alternatives considered at this stage comprised different technologies, different geographical connection points, or a combination of the two. **ES Chapter 3: Alternatives [APP-127]** considered 5 options drawn from a long list of 27. Subsequently, the design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles.<br><br>**ES Chapter 3: Alternatives [APP-127]** provides an overview of the design rationale for the Project. It explains how the Project will avoid or reduce significant environmental effects, including landscape and visual effects, wherever practicable, from the initial option identification and selection stage up to the refinement of the Project in response to feedback, further assessments and design work. The site selection process and consideration of alternatives are also summarised in **ES Chapter 3: Alternatives [APP-127**] which shows that a wide range of alternatives were considered in the design of the Project, taking into account the EIA process, ground investigations and feedback from consultees received from formal consultation exercises and Project meetings<br><br>The **Design Development Report [APP-122]**, **Design and Access Statement [APP-353] and Design Approach for Appraisal of Site Specific Infrastructure [APP-354] and Design and Access Statement and Planning Statement [APP-085]** should be read alongside both **ES Chapter 3: Alternatives [APP-127]**, which documents the key environmental factors in |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | consideration of the main alternatives, and Chapter 5 of the **Planning Statement [APP-085]** which explains how planning policy, as well as the requirements of the Electricity Act and the principles of the Holford and Horlock Rules, have influenced the optioneering and design evolution process. |
| 2.11.~~14~~ 4 | In circumstances where it can be demonstrated that a mitigation measure and/ or technological approach is appropriate and/ or necessary for a Project, including to limit landscape and visual impact as set out above, the Secretary of State should take this into account in decision making. | See response to 2.9.11. |
| 2.11.5 | Nationally designated landscapes have specific statutory purposes ~~which help ensure their continued protection~~. The Secretary of State should have special regard to nationally designated landscapes, where the general presumption in favour of overhead lines should be reversed to favour undergrounding. In addition, the Secretary of State must seek to further the purpose(s) of designated landscapes when making decisions which effect land within the designated area. EN-1 (Section 5.10) and paragraphs 2.9.7 to 2.9.26 above have further guidance on this requirement. | See response to 2.9.12.<br>Section 245 (Protected landscapes), of the Levelling-Up and Regeneration Act 2023 states (and where relevant to the Project):<br>'*(A1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.*<br>*(A2) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a devolved Welsh authority must have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty*.'<br>The clause expands the duty on certain public authorities, including Statutory Undertakers (including National Grid), when carrying out functions in relation to these landscapes to seek to further the statutory purpose and confers a power to make provision as to how they should do this. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | | The legislation has been expanded from 'having regard' to the statutory purpose of the protected landscapes to stating relevant authorities 'must seek to ~~-~~further the purpose' of protected landscapes such as National Landscapes.<br><br>National Grid considers the Project is compliant with the new 2023 Act obligation as set out above~~,~~ and has been sited and designed to reduce the potential for adverse effects on the designation and alteration of its defined special qualities, as far as practicable including the~~as the Project~~ proposal~~s~~ to underground the proposed 400 kV overhead line within the Dedham Vale National Landscape and beyond its boundary.<br><br>The additional measures proposed and approach to the protected landscape duty being taken by National Grid has been discussed with stakeholders to seek their feedback. Engagement is being undertaken with the Dedham Vale National Landscape Partnership and relevant local authorities. This engagement is ongoing.<br><br>The measures to evidence the 'seek to further' duty under s245 of the Levelling-Up and Regeneration Act 2023 have been set out in the National Landscapes – **Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000)** **[APP-120]**. The measures will be secured by a legal agreement which is subject to ongoing discussion. |
| 2.11.6 | Away from ~~these protected~~designated landscapes and in locations where there is a high potential for widespread and significant adverse landscape and/or visual impacts, the Secretary of State should be satisfied that the applicant has provided evidence to support a decision on whether undergrounding is or is not appropriate, having considered this on a case-by-case basis, weighing the considerations in paragraph 2.9.~~24~~25 above. | See response to 2.9.23. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | **Noise and vibration** | |
| 2.11.7 | The Secretary of State should ensure that appropriate assessment methodologies have been used in the evidence presented to it, and that the appropriate mitigation options have been considered and adopted. Where the applicant can demonstrate that appropriate mitigation measures will be put in place, the residual noise impacts are unlikely to be significant. | The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce noise and vibration impacts and effects through the process of design development, and by embedding measures into the design of the Project. **ES Chapter 14: Noise and Vibration [APP-256]** presents the assessment of the noise and vibration effects.<br>Operational noise from overhead lines is scoped out of the ES, in accordance with the **Scoping Opinion [APP-297]**, on the basis that a low noise conductor system is proposed. However, information on noise from overhead lines is provided in **ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) [APP-261].** |
| 2.11.8 | Consequently, noise from overhead lines is unlikely to lead to the Secretary of State refusing an application, but it may need to consider the use of appropriate requirements in the DCO to ensure noise is minimised as far as is practicable. | Operational noise from overhead lines is scoped out of the **ES, in accordance with the Scoping Opinion [APP-297]**, on the basis that a low noise conductor system is proposed. However, information on noise from overhead lines is provided in **ES Appendix 14.5: Operational Noise from Overhead Lines (Informative) [APP-261].** |
| | **Electric and Magnetic Fields (EMFs)** | |
| 2.11.9 | This NPS does not repeat the detail of the ICNIRP 2020 guidelines on restrictions or reference levels. The government has developed with the electricity industry a Code of Practice, 'Power Lines: Demonstrating compliance with EMF public exposure guidelines – a voluntary Code of Practice', published in February 2011 that specifies the evidence acceptable to show compliance with ICNIRP (2020) guidelines and is also in line with the | The Code of Practice provides a practical way to demonstrate compliance with the ICNIRP 1998 guidelines applicable to 50 Hz power-frequency EMFs. This Code of Practice provides no guidance on how to assess compliance of power lines with the ICNIRP 2020 guidelines.<br>National Grid is unclear on the application of ICNIRP 2020 guidelines to EMF for electricity assets and are aiming to clarify this point with DESNZ. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | terms of the 1999 EU Council Recommendation on EMF exposure. | |
| 2.11.11 | Industry currently applies optimal phasing to 275kV and 400kV overhead lines voluntarily wherever operationally possible, which helps to minimise the effects of EMF. The government has developed with industry a voluntary Code of Practice, 'Optimum Phasing of high voltage double-circuit Power Lines – A Voluntary Code of ~~Practice'30~~Practice', published in March 2012, that defines the circumstances where industry can and will optimally phase lines with a voltage of 132kV and above. | The code of practice on optimum phasing has been applied to the Project as detailed in the **Electric and Magnetic Field Compliance Report [APP-330]**. |
| 2.11.12 | Where the applicant cannot demonstrate that the line will be compliant with the Electricity Safety, Quality and Continuity Regulations 2002, with the exposure guidelines as specified in the Code of Practice on compliance, and with the policy on phasing as specified in the Code of Practice on optimal phasing then the Secretary of State should not grant consent. | See response to 2.10.11. |
| 2.11.13 | Undergrounding of a line would reduce the level of EMFs experienced, but high magnetic field levels may still occur immediately above the cable. It is the government's policy that power lines should not be undergrounded solely for the purpose of reducing exposure to EMFs. | Noted. Undergrounding on the Project has not been undertaken on EMF grounds. |
| 2.11.15 | Where a statutory consultee on the safeguarding of technical facilities identifies a risk that the EMF effect of electricity network infrastructure would compromise the effective and safe operation of such facilities, the potential impact and siting and design alternatives will need to have been fully considered as part of the application. | The development of measures to avoid, reduce or compensate for any significant adverse effects of a Project is an intrinsic part of the Option Appraisals process and, from the outset, the route selection process described in **ES Chapter 3: Alternatives [APP-127].** Where a statutory consultee raises issues, National Grid are committed to mitigating any significant risks associated with EMF from our assets. |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| 2.11.16 | The diagram below shows a basic decision tree for dealing with EMFs from overhead power lines. | This decision tree has formed the basis for the assessment of EMF from the Project, as demonstrated in the **Electric and Magnetic Field Compliance Report [APP-330]**. |
| | **Sulphur Hexafluoride** | |
| 2.11.17 | The Secretary of State should grant consent for an electricity networks development only if the applicant has demonstrated either:<br>~~i. that~~That the development will not use SF6; or<br>~~ii.~~ (a) ~~that~~That there is no proven commercially available alternative to the use of SF6; and<br>(b) ~~that~~That a bespoke SF6-free alternative would be grossly disproportionate in terms of cost; and<br>(c) ~~that~~That emissions monitoring and control measures compliant with the F-gas Regulation and/or its successors are in place. | Sulphur Hexafluoride (SF6) is an '*insulating and arc-suppressant gas used in high-voltage switchgear for electricity networks. It is also an extraordinarily potent greenhouse gas, and fugitive emissions from electricity networks infrastructure are an object of increasing environmental concern, especially in light of the UK's commitment to net zero by 2050*'.<br>As outlined in **ES Appendix 4.1: Greenhouse Gas Assessment [APP-131]**, it is assumed that no SF6 equipment will be used in the Project, in accordance with National Grid policy. SF6 alternatives such as C4 or G3 have a 99% lower global warming potential (GWP) than SF6. |
| **2.12** | **Special assessment principles for offshore-onshore transmission** | |
| 2.12.1 | Details in this section are in addition to those set out in EN-3 on the network connections for offshore wind including different types of offshore transmission. These include EN-3 ~~sections~~paragraphs 2.8.~~24~~34 – 2.8.~~33~~43 and 2.8.~~49 –~~52 - 2.8.~~56~~66 on network connections~~, 2.8.66 - 2.8.69 on micrositing~~ and 2.8.~~80-2.8.82 on Offshore Wind Environmental Standards which include offshore transmission and should be considered together with the details below~~69 - 2.8.72 on micro-siting. | It is National Grid's case that NPS EN-3 is relevant insofar as it provides strong support for the delivery of renewable energy developments supported by the Project. |
| 2.12.4 | As identified in EN-1, it is important that the network planning for offshore transmission is much more closely co-ordinated with the planning and development of the onshore transmission network than ~~previously~~historically. | As reported in response to EN-1 Paragraph 3.3.74: National Grid has coordinated with other projects at the project development stage for the offshore element of the Project. As part of the Offshore Coordination Support Scheme (OCSS), National Grid |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | This includes all types of offshore transmission including interconnectors, ~~multi-purpose interconnectors (MPIs~~Offshore Hybrid Assets (OHAs) and subsea 'onshore' transmission or 'bootstraps' reinforcing the onshore transmission ~~network. 32~~network36. Further details on the different types of offshore transmission are provided in the Glossary. | formed a consortium with the promoters of RWE Five Estuaries and RWE North Falls to explore the feasibility of an offshore coordination between the two offshore windfarms and the Project.<br>Throughout the OCSS process, National Grid maintained an ongoing review of the potential implications of re-purposing Sea Link as an offshore wind farm connection point. Given that the SoS decided not to grant further funding to the OCSS based on likely significant increased capital and constraint costs of coordination and an up to five year delay to the overall programme for RWE Five Estuaries and RWE North Falls, which would have a likely adverse impact on the Government's 2030 renewable energy deployment targets, a more detailed design and consenting strategy was not progressed. The timeline for these Projects to be delivered has limited the ability of the Project to coordinate offshore but it has nonetheless been considered.<br>The Project is considered a CNP infrastructure Project in line with NPS EN-1, EN-3 and EN-5. |
| 2.12.5 | The above offshore-onshore transmission co-ordination ~~work is undertaken~~was enabled through ~~a process of ongoing reform with~~ the ~~key outcomes including the Holistic~~Offshore Transmission Network ~~Design and its subsequent follow up exercises for offshore-onshore transmission~~Review which led to the HND and subsequent strategic network planning exercises ~~such~~, as well as the ~~Centralised Strategic Network Plan~~planned CSNP led by ~~National Grid Electricity System 33 and/or the Future Systems (once established).~~NESO. | |
| 2.12.6 | In addition, a more co-ordinated approach to designing offshore transmission is expected to be adopted compared with the previous standard approach of radial routes to shore. This applies to spatially close groups of offshore windfarms, subsea 'onshore' transmission or bootstraps, interconnectors and ~~multi-purpose interconnectors.~~OHAs. | |
| | **Critical National Priority** | |
| 2.12.7 | As highlighted in EN-1 government has concluded that there is a CNP for the provision of nationally significant low carbon infrastructure. This includes for electricity ~~grid~~network infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those associated specifically with a particular | The Project, as electricity transmission infrastructure constitutes Critical National Priority infrastructure.<br>The **Planning Statement [APP-085]** explains that the Project is Critical National Priority Infrastructure. Without reinforcement, the capacity of the existing network in East Anglia and the South East is insufficient to accommodate the connection of proposed new |

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| | generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System. This includes infrastructure identified in the ~~Holistic Network Design~~HND and subsequent strategic network design exercises, see Section 2.13 below. | power sources connecting in the area. As such, the Project is considered to be a means of all of the following:<br>• Connecting a new generating station or storage facility to the network<br>• Reinforcing the network to accommodate such connections, and<br>• Reinforcing the network to ensure that it is sufficiently resilient and capacious. |
| **2.13** | **Offshore-onshore transmission: Applicant assessment** | |
| | **Consideration of strategic network design** | |
| 2.13.2 | The HND and subsequent network design and planning ~~exercises~~exercises39 identify and establish the transmission capabilities needed, both onshore and offshore, to support offshore wind developments. These include the onshore connection points for offshore transmission and potential future ~~Multi-Purpose Interconnector~~OHA opportunities. Government recognises the work undertaken in the HND; the HND and subsequent network design ~~exercises are likely to~~exercise contain information that is important and relevant in the consideration of applications for infrastructure resulting from those exercises. | As reported in response to EN-1 Paragraph 3.3.74: National Grid has coordinated with other projects at the project development stage for the offshore element of the Project. As part of the Offshore Coordination Support Scheme (OCSS), National Grid formed a consortium with the promoters of RWE Five Estuaries and RWE North Falls to explore the feasibility of an offshore coordination between the two offshore windfarms and the Project.<br>Throughout the OCSS process, National Grid maintained an ongoing review of the potential implications of re-purposing Sea Link as an offshore wind farm connection point. Given that the SoS decided not to grant further funding to the OCSS based on likely significant increased capital and constraint costs of coordination and an up to five year delay to the overall programme for RWE Five Estuaries and RWE North Falls, which would have a likely adverse impact on the Government's 2030 renewable energy deployment targets, a more detailed design and consenting strategy was not progressed. The timeline for these Projects to be delivered has limited the ability of the Project to coordinate offshore but it has nonetheless been considered. |

## 1.4 Signposting for Compliance with NPS EN-3 (January 2026)

Table 1.10 Signposting for Compliance with EN-3

| Paragraph No. | Policy Requirement | How the Project Meets the Policy |
|---|---|---|
| **2.8** | **Offshore Wind and Offshore Transmission Infrastructure** | |
| | Offshore-onshore network connection | |
| 2.8.35 | The previous standard approach to offshore-onshore connection involved a radial connection between single wind farm projects and the shore. A coordinated approach will involve the connection of multiple, spatially close, offshore wind farms and other offshore infrastructure, wherever possible, as relevant to onshore networks. | As reported in response to EN-1 Paragraph 3.3.74: National Grid has coordinated with other projects through the process of routing and siting and design development. This has included choosing a shared point of connection and exploring the concept of co-locating converter stations, sharing cable corridors and landfalls and also considering coordination in project delivery.<br>National Grid has coordinated with other projects at the project development stage for the offshore element of the Project. As part of the Offshore Coordination Support Scheme (OCSS), National Grid formed a consortium with the promoters of RWE Five Estuaries and RWE North Falls to explore the feasibility of an offshore coordination between the two offshore windfarms and the Project.<br>In April 2022 the Government announced the offshore Coordination Support Scheme (OCSS). The OCSS provided grant funding to Projects, it was available to those that were further developed than those eligible for the HND, to explore potential coordination options for offshore transmission infrastructure. At that stage five Projects, including the North Falls and Five Estuaries offshore wind farms, Sea Link, Euro Link (now Lion Link) and Nautilus committed to exploring coordinated network designs. Applications to the OCSS closed on 28 February 2023 and a consortium of North Falls, Five Estuaries and Sea Link was successful in receiving grant funding. |

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

## 1.5 Signposting for Compliance with National Planning Policy Framework (NPPF) (Consultation Draft December 2025)

Table 1.11 Signposting for Compliance with Consultation Draft NPPF (December 2025)

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| **Section 1** | **Introduction- Purpose of the planning system** | |
| Para 3 | Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The national decision-making policies in this Framework are a material consideration in making these decisions and should be read alongside the policies in the development plan. | The Planning Act 2008 at section 104 (2) (3) states that where a national policy statement has effect, decisions must be made on DCO applications in accordance with any relevant national policy statement unless an exception applies. Consideration as to how the Project has had regard to local planning policy is set out in this **Policy Compliance Document [APP-086].** |
| Para. 14 & Para 15 | The purpose of the planning system is to contribute to the achievement of sustainable development, by managing the use and development of land in the long-term public interest.<br>At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection. | The Norwich to Tilbury Project is a proposal by National Grid to reinforce the high voltage power network in East Anglia. The reinforcement is needed because the existing transmission network, even with current upgrading, will not have sufficient capacity for the new renewable energy (a substantial proportion of which is generated by offshore wind) that is expected to connect to the network over the next ten years and beyond. Completion of the Project, together with other new reinforcements across the country will meet this future energy transmission demand both in East Anglia and across the UK.<br>The **Planning Statement [APP-085]** explains that the Project is Critical National Priority Infrastructure as defined in National Policy Statement EN-1. Without reinforcement, the capacity of the existing network in East Anglia and the Southeast is insufficient to accommodate the connection of proposed new power sources connecting in the area. |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| Para. 16 | Achieving sustainable development means that the planning system has three overarching objectives in providing for the homes, commercial development, facilities and infrastructure which society needs. These objectives are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across all three):<br>An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.<br>A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible community facilities, public service infrastructure and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and<br>An environmental objective – to support efforts to mitigate and adapt to climate change, including moving to a low carbon economy; and to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, and minimising waste and pollution. | The **Planning Statement [APP-085]** provides an assessment of the Project against the objectives to sustainable development.<br>The Project is Critical National Priority Infrastructure as defined in National Policy Statement EN-1 and is essential to ensure the existing transmission network will have sufficient capacity for the new renewable energy (a substantial proportion of which is generated by offshore wind) that is expected to connect to the network over the next ten years and beyond.<br>**ES Chapter 15: Socio-Economics, Recreation and Tourism [APP-265]** details the likely significant effects of the Project on employment and business activity during construction, severance and sterilisation of land (in the context of its potential for future development during construction and operation, disruption to community facilities and tourism and recreational facilities. It concludes that with embedded mitigation and control management measures, there is considered to be no likely significant adverse socio-economic, recreation and tourism effects expected as a result of the Project.<br>The Applicant recognises the importance of skills development and workforce planning and has already given detailed consideration to the scale and nature of employment likely to arise from the Project. Due to the characteristics of the works, the maximum peak onsite construction workforce attributable to local labour is anticipated to be approximately 172 Full Time Equivalent (FTE) roles, with a total local job demand of approximately 480 roles across the four-year construction period. This level of employment is modest in scale and is not considered significant when compared with employment demand in other sectors or large-scale regeneration schemes. |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| | | The Applicant is committed to supporting skills development and workforce planning at both local and regional levels, beyond the scope of this individual Project. This includes:<br>• Working with local suppliers and supporting forums, such as Chambers of Commerce<br>• Contributing to a coordinated regional approach to electricity industry jobs and skills planning<br>• Engaging with Local Authorities to understand local priorities and opportunities around skills and employment.<br>These commitments form part of the Applicant's wider approach to community benefits and legacy and are broader than, and separate from, the DCO process. The delivery of these initiatives will be taken forward through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with established guidance.<br>**ES Chapter 8: Ecology and Biodiversity [AS-026]** sets out the assessment of likely significant ecology and biodiversity effects that could result from the Project. The chapter concludes that no residual significant long-term effects are predicted on ecological and biodiversity receptors, as a result of the construction and operation of the Project.<br>While there is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure Projects for which development consent is required, the Project has committed to achieve a minimum of 10% Biodiversity Net Gain (BNG) (though onsite and offsite BNG) and undertaken a BNG assessment (based on the statutory biodiversity metric) which is presented in the **Biodiversity Net Gain Report [APP-299].** |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| **Section 4**<br>**Achieving sustainable development - Plan-making policies** | | |
| S1: Positive plan-making | 1.The development plan should plan positively for future growth and change by:<br>Seeking to meet the development needs of their area as a minimum. For spatial development strategies, and for local plans where a spatial development strategy is not in place22, this means providing for objectively assessed needs for housing and other uses (including supporting infrastructure), as well as any needs that cannot be met within neighbouring areas, unless:<br>the application of the policies in this Framework that protect areas or assets of particular importance23 provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or<br>any adverse impacts of doing so would substantially outweigh the benefits, when assessed against the policies in this Framework taken as a whole.<br>Providing for new development, and improvement of the environment, in a way which promotes a sustainable pattern of growth and seeks to mitigate climate change and adapt to its effects. | Noted: The need for the Project is set out in the **Strategic Options Backcheck and Review Report [APP-355]** and the **Planning Statement [APP-085]**. In deciding the Application in accordance with Section 104(3) of the Planning Act 2008 the SoS must be satisfied that 'the adverse impacts of the proposed development would outweigh its benefits' (Section 104(7)). To determine this, a balance of the Project's adverse impacts against its benefits must be carried out.<br>The Planning Statement demonstrates that the Project is in accordance with NPSs EN-1, EN-3 and EN-5. There is also a presumption that the urgent need for CNP infrastructure, such as the Project, will 'in general outweigh any other residual impacts not being addressed by the application of the mitigation hierarchy' (Paragraph 3.3.63 of EN-1. The Project will help meet the urgent need for CNP infrastructure to meet 'energy objectives, together with the national security, economic, commercial, and net zero benefits'. |
| S2: Producing a spatial strategy | The development plan should set out a spatial strategy setting clear expectations for the location of development and where land should be protected or enhanced for specific purposes, by identifying at an appropriate scale: | Noted. |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| | Settlements within the development plan area, whether existing or proposed, and their boundaries (or clear criteria for identifying settlement extents). Settlements should include any allocations that would ultimately form part of the settlement;<br>The location and boundary of town centres within settlements, or other specific areas where particular approaches to development apply;<br>Land that is protected or proposed to be enhanced for specific purposes (such as habitat improvement) and which places limits on whether development proposals may be acceptable or where specific policies apply; and<br>Sites allocated for development to meet the identified need for housing and other uses in the area and for local and strategic infrastructure (including any proposals to enable the development of land around stations).<br>The spatial strategy should be illustrated on a key diagram forming part of a spatial development strategy and/or local plan, with the boundaries of specific policy areas, land- use designations and allocations identified on a policies map. | |
| **Section 4**<br>**Achieving sustainable development - National decision-making policies** | | |
| S3: Presumption in favour of sustainable development | Decisions on development proposals should apply a presumption in favour of sustainable development. This means: | Noted. The Project is defined as a NSIP, under s14(1)(b) and s16 of the PA 2008, and as amended by the Planning Act 2008 (Nationally Significant Infrastructure Projects) (Electric Lines) Order 2013, as it involves the installation of a new electric line above ground of more than 2 km, which would operate at 400 kV in England. |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| | Policy S4 in this Framework should be applied when considering development proposals within settlements;<br>Outside settlements, policy S5 should be applied; and<br>In all locations, development proposals that accord with an up-to-date development plan and also the decision-making policies in this Framework should be approved without delay. | For an NSIP, the grant of development consent is required by the making of a DCO under the PA 2008. A DCO may include a range of consents and powers.<br>Part 6 of the PA 2008 is to be applied when determining an application for a DCO. Sections 103 to 107 of the PA 2008 provide the framework for decision making of an Application for Development Consent. Section 104(2) provides that, in deciding applications for development consent, the SoS must have regard to the relevant NPSs. In this case, the Energy NPSs are of relevance to the Project, therefore Section 104 of the PA 2008 applies. The following NPSs which came into force on 17 January 2024 are relevant to the Project:<br>• Overarching National Policy Statement for Energy (EN-1)<br>• National Policy Statement for Electricity Networks Infrastructure (EN-5)<br>• National Policy Statement for Renewable Energy Infrastructure (EN-3)<br>The Overarching National Policy Statement for Energy (EN-1) sets out national policy for energy infrastructure in combination with the relevant technology-specific NPS which in this case is National Policy Statement for Electricity Networks Infrastructure (EN-5). EN-1 emphasises the need for new energy projects to contribute to a secure, diverse, reliable and affordable energy supply.<br>The National Policy Statement for Electricity Networks Infrastructure (EN-5) sets out the government's policy for nationally significant electricity transmission networks and, together with EN-1, identifies the information that should be provided alongside any application for development consent to satisfy their requirements. |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| | | As set out within the Planning Statement and as identified in national policy and the Government's energy strategy there is an urgent and critical need to bring forward low carbon infrastructure to meet targets for decarbonisation and net zero. The Project will contribute to the delivery of these policy aims, by improving the existing electricity transmission network to accommodate the connection of proposed new power sources in East Anglia.<br>It is clear that there is a compelling case and established need for the Project and that it will deliver national economic, social and environmental benefits in line with the Government's clear objectives of delivering sustainable development. |
| **Section 5**<br>**Meeting the challenge of climate change**<br>**National decision-making policies** | | |
| Policy CC2: Mitigation of climate change | In order to contribute to climate change mitigation and the transition to net zero, development proposals should, where relevant to the proposal:<br>a. Be located where a genuine choice of sustainable transport modes exists, and improve opportunities for walking, wheeling, cycling and public transport, in accordance with policies TR3 and TR4;<br>b. Support good access to facilities to limit the need to travel, whether through the development's location, through development densities which improve catchment populations for local services, or by incorporating community facilities and premises to support local employment opportunities;<br>c. Use design approaches which conserve energy and other resources in accordance with policy | The Project would support the UK's net zero target to achieve net zero emissions by 2050 through the connection in East Anglia of new low carbon energy generation, and by reinforcing the transmission network. A **Greenhouse Gas Assessment (ES Appendix 4.1, [APP-131])** has been prepared in support of the Project. This identifies the carbon dioxide equivalent emissions that would be released during the construction and operation of the Project. The assessment concludes that the construction and operational CO2e numbers are not considered to have a material impact on the ability of the Government to meet its carbon reduction targets and therefore are not significant. Therefore, the operational, medium to long term benefits of delivering the Project on a national level are considered to outweigh any short-term impacts of greenhouse gas (GHG) emissions because of material use and construction activities. |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| | DP3(1)(c); d. Take advantage of opportunities to re-use existing structures and materials, including by re-using non-contaminated excavated soil and hardcore within the site;<br>e. Take advantage of opportunities to draw low carbon energy from decentralised networks (such as district heat networks), where these are available, and to co-locate energy and heat generators and users, especially to take advantage of suppliers of surplus heat and energy;<br>f. Contribute to the creation or restoration of habitats which can act as carbon stores, such as through woodland planting and peatland restoration, while avoiding harm to habitats which can act as important carbon stores, including peatland and salt marsh; and g. Not increase the extraction of fossil fuels unless it is in accordance with policy M5.<br>2. Substantial weight should be given to the benefits of improving the energy efficiency of existing buildings and/or drawing energy from district heat networks, renewable and low carbon sources (including through the installation of heat pumps and solar panels where these do not already benefit from permitted development rights) | The Project is supported by an **Outline Site Waste Management Plan – Appendix B of the CoCP [APP-302]** which sets out project specific measures that will be employed to reduce the consumption of raw materials and to use the mitigation hierarchy for waste as part of reducing waste sent to landfill.<br>The Applicant recognises the importance of skills development and workforce planning and has already given detailed consideration to the scale and nature of employment likely to arise from the Project. Due to the characteristics of the works, the maximum peak onsite construction workforce attributable to local labour is anticipated to be approximately 172 Full Time Equivalent (FTE) roles, with a total local job demand of approximately 480 roles across the four-year construction period. This level of employment is modest in scale and is not considered significant when compared with employment demand in other sectors or large-scale regeneration schemes.<br>The Applicant is committed to supporting skills development and workforce planning at both local and regional levels, beyond the scope of this individual Project. This includes:<br>• Working with local suppliers and supporting forums, such as Chambers of Commerce<br>• Contributing to a coordinated regional approach to electricity industry jobs and skills planning<br>• Engaging with Local Authorities to understand local priorities and opportunities around skills and employment.<br>These commitments form part of the Applicant's wider approach to community benefits and legacy and are broader than, and separate from, the DCO process. The delivery of these initiatives will be taken forward through non-statutory community benefit and engagement mechanisms, rather than |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| | | through the development consent process, consistent with established guidance. |
| Policy CC3: Adaptation to climate change | 1. Development proposals should take into account the current and potential impacts of climate change over the lifetime of the scheme, and in order to minimise vulnerability to these impacts should, where relevant to the proposal:<br>a. Be located where the risk of flooding is minimised, or can be managed and the development made safe without increasing risk elsewhere, in accordance with policies F4, F5, F6, F7 and F8;<br>b. Comply with policy F9 where development would be located in an area vulnerable to coastal change;<br>c. Incorporate sustainable drainage systems to manage surface water flow rates and reduce volumes of runoff in accordance with policy F8;<br>d. Use design approaches which minimise risks from overheating in accordance with policy DP3(1)(c), and include green infrastructure and suitable tree planting in accordance with policies DP3(1)(d) and N3; and<br>e. Where development is, or is likely to be, at heightened risk from wildfires – such as where it is located adjacent to land used for agriculture, heathland or woodland – proposals should incorporate suitable mitigation measures, where possible, to reduce fuel loads and create defendable spaces (for example avoiding fire pathways such as fences, and incorporating | Consideration of climate change effects on flood risk over the lifetime of the Project are assessed within the **FRA [APP-331]** which also documents the embedded and good practice measures included to make the Project resilient to climate change. National Grid has assessed potential impacts of climate change and incorporated adaptation/resilience throughout the lifetime of the Project. The Project has been designed to be resilient to climate change by locating the above ground elements of the Project, including the substations, CSE compounds and construction compounds, outside of Flood Zones 2 and 3 as described in the FRA. The CSE compound site at Wenham Grove is partially situated in Flood Zone 3 following the release of updated flood mapping dataset from the Environment Agency in March 2025. This CSE compound would be laid out in accordance with the sequential approach, whereby the most vulnerable components are located in areas at lowest risk of flooding. The requirements for compensation of loss of floodplain storage associated with the pylons is addressed in the following sub-section and secured by commitment W17 in the **Outline CoCP [APP-300]**. No discernible loss of floodplain storage is associated with the CSE compound, associated above ground infrastructure has a very limited footprint. The remaining structures, including above ground structures such as pylons and below ground structures such as the underground cables are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement.<br>The **Outline CoCP [APP-300]** describes the flood practice measures including SuDS for managing surface water flood |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| | firebreaks into development layouts and planting schemes). | risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime. |
| **Section 7**<br>**Building a strong, competitive economy- Plan-making policies** | | |
| E1: Providing the conditions for long term economic growth | To support business investment and employment, development plans should, at the most appropriate level:<br>Set out a clear economic vision and strategy, which takes a positive, proactive and realistic approach to encouraging sustainable economic growth in both urban and rural areas, having regard to the Industrial Strategy and any relevant strategic and local strategies for economic development and regeneration. In doing so they should take into account both local business needs and wider opportunities for economic growth, including priority places for investment in key sectors set out in the Industrial Strategy, and the location of Industrial Strategy Zones34 and AI Growth Zones;<br>Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and<br>Allocate sites to implement the economic vision and strategy and meet existing and anticipated needs over the plan period, paying particular regard to facilitating development to meet the needs of a modern economy (including sites and premises which are flexible and adaptable) and the specific | In addition to the need to decarbonise existing electricity supplies, a substantial increase (double by 2050) in the total electricity generated to enable decarbonisation across all sectors is needed. The Project is designed to support this increasing demand for electricity, as set out in **The Strategic Options Backcheck and Review Report [APP-355]** and the **Planning Statement [APP-085].** |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| | locational requirements of different sectors. This includes, where a need exists or is anticipated, making provision for:<br>clusters, networks and sites for knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure to support the growth of these industries (including laboratories, campus facilities, data centres and associated generating capacity, and grid connections);<br>storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain (including 'last mile' deliveries), transport innovation and decarbonisation; and<br>the expansion or modernisation of other businesses of local, regional or national importance to support economic growth and resilience (including industries such as leisure and tourism which may be of particular importance in certain areas).<br>Given changing commercial property requirements, development plans should not be overly prescriptive about the types of uses that would be acceptable on particular sites (other than where there is a clear and justified rationale for being specific about acceptable uses at the plan-making stage). | |
| **Section 7**<br>**Building a strong, competitive economy- National decision-making policies** | | |
| E2: Meeting the need for | To support business growth, substantial weight should be given to: | Noted. **ES Chapter 15: Socio Economics, Recreation and Tourism [APP-265]** includes an assessment of the Project |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| business land and premises | The economic benefits of proposals for commercial development which allow businesses to invest, expand and adapt; especially where this would support the economic vision and strategy for the area, the implementation of the Industrial Strategy, support improvements in freight and logistics and/or reflect proposals for Industrial Strategy Zones and AI Growth Zones;<br>Benefits for domestic food production, animal welfare and the environment which can be demonstrated through proposals for development for farm and agricultural modernisation.<br>Where a development proposal is required to demonstrate whether an unmet need exists (including to demonstrate compliance with policy S5) consideration should be given to whether:<br>Market signals indicate an undersupply of specific types of land or premises, taking into account the anticipated catchment area for the type of development proposed, the changing needs of different sectors and the availability of existing land and buildings; or<br>A development proposal's specific locational requirements are met by existing allocations in the development plan. This includes, but is not limited to, situations where:<br>existing businesses plan to expand or improve their premises, or clusters or networks of businesses need to grow (such as clusters of knowledge and data- driven, creative or high technology industries and associated facilities and infrastructure); or | effects on socio economics, recreation and tourism that could arise from the construction and operation (including maintenance) of the Project.<br>National Grid promotes the use of local supply and small/medium enterprises through main contractors by embedded targets within its framework contracts. National Grid will continue to work with relevant planning authorities and business leaders at a national, regional and local level to identify opportunities to invest in employment networks, including looking for opportunities to work with local businesses. |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| | the availability of infrastructure (such as adequate grid connections or water and wastewater capacity) makes certain locations particularly important, including opportunities to co-locate large-scale generators and users of power (such as data centres); or<br>proposals would meet a local, regional or national need for the provision of new, expanded or upgraded facilities that would result in more efficient, reliable or sustainable handling of goods (whether for their receipt, storage, processing, interchange or distribution). | |
| **Section 10**<br>**Securing clean energy and water- Plan-making policies** | | |
| W1: Planning for energy and water | 1. The development plan should be informed by early engagement between the relevant plan-making authority, utility providers, regulators and network operators, so that there is a clear understanding of energy supply and network capacity, water supply, drainage and wastewater capacity, and associated requirements for additional infrastructure provision. This engagement should take into account the impacts of planned growth, changing consumption patterns and climate change, as well as relevant infrastructure plans, and be used to address potential constraints to development arising from current or anticipated infrastructure shortfalls.<br>2. The development plan should reflect this at the most appropriate level by: | Noted. As identified in national policy and the Government's energy strategy there is an urgent and critical need to bring forward low carbon infrastructure to meet targets for decarbonisation and net zero. The Project will contribute to the delivery of these policy aims, by improving the existing electricity transmission network to accommodate the connection of proposed new power sources in East Anglia. As set out in the **Planning Statement [APP-085]**, like much of the high voltage electricity transmission network across the country, the network in East Anglia was largely developed in the 1960s. It was built to supply regional demand, centred around Norwich and Ipswich, and fed from our Bramford Substation.<br>Although the network in East Anglia can accommodate the level of generation and demand that there is today, this situation will change over the next decade. Growth in offshore wind generation and interconnectors to Europe has seen a significant number of |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| | a. Making provision for development which is required for new or enhanced renewable and low carbon energy development, electricity network infrastructure, water supply, drainage and wastewater infrastructure, whether as part of wider development proposals or as stand-alone developments; and<br>b. Setting out any measures to avoid constraints on the operation or future expansion of renewable and low carbon energy development and electricity network infrastructure and water supply and wastewater infrastructure as a result of neighbouring (or nearby) development. | connections planned in the East Anglian and south-east coastal areas of England.<br>The existing transmission network infrastructure in the East Anglian and south-east areas was not originally designed to accommodate such large volumes of generation capacity.<br>As such the network will require significant reinforcements both in the form of new substations and transmission circuits to provide connections for these new customers and to ensure that power can be transferred securely to the onshore demand centres to meet the needs of electricity consumers in Britain.<br>In November 2024, the National Energy System Operator (NESO) published Clean Power 2030: Advice on achieving clean power for Great Britain by 2030 (NESO, 2024). This report states that 'Three projects have been identified as critical to delivering a network which supports the clean power pathways, but at present have delivery dates after 2030. Support is therefore needed to bring these projects forward for 2030 delivery. These are projects in East Anglia and in the southeast that are critical for connecting offshore wind in the North Sea and supporting the flow of clean power. Our assessment suggests that without these projects, the clean power objective would not be achieved, leaving the clean power target short by around 1.6% in 2030 (assuming a typical weather year) and consumers could face extra constraint costs of around £4.2 billion in 2030.' The Project is specified as two of those three projects. The critical and urgent nature of the project is therefore also recognised in the strongest terms in a recent report in achieving Clean Power 2030 objectives.<br>It is clear that there is a compelling case and established need for the Project and that it will deliver national economic, social and environmental benefits in line with the Government's clear objectives of delivering sustainable development. |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| W2: Securing renewable and low carbon energy, and electricity network infrastructure | The development plan should support the transition to clean power by planning positively for the increased supply and use of renewable and low carbon energy and electricity network infrastructure. This means that the development plan, should, at the most appropriate level, seek to maximise the potential for suitable development by identifying:<br>Areas which are suitable for renewable and low carbon energy development and electricity network infrastructure, including for future re-powering and life extension, where this would help secure their development; and<br>Opportunities for development to draw its heat or energy supply from decentralised networks (such as district heat networks), renewable or low carbon energy supply systems, and for co-locating potential customers and suppliers of surplus heat or energy. | National Grid notes and supports this policy wording in planning positively for electricity network infrastructure. In drafting local plan policies, local authorities will need to engage with National Grid and be cognisant of the Strategic Spatial Energy Plan (SSEP), Centralised Strategic Network Plan (CSNP) and Regional Energy Strategic Plans (RESPs) currently being prepared by NESO. |
| W3: Renewable and low carbon energy development and electricity network infrastructure | In considering proposals for renewable and low-carbon energy development and electricity network infrastructure, substantial weight should be given to:<br>The benefits of such development for improving energy security, supporting economic development and moving to a net zero future;<br>In the case of applications for the re-powering and life-extension of existing sites, the additional benefit of utilising an established site for this purpose; and<br>The contribution that small-scale and community-led renewable and low carbon energy projects can make to reducing emissions, along with their associated economic and social benefits. | Noted. As identified in national policy and the Government's energy strategy there is an urgent and critical need to bring forward low carbon infrastructure to meet targets for decarbonisation and net zero. The Project will contribute to the delivery of these policy aims, by improving the existing electricity transmission network to accommodate the connection of proposed new power sources in East Anglia. As set out in the **Planning Statement [APP-085]**, like much of the high voltage electricity transmission network across the country, the network in East Anglia was largely developed in the 1960s. It was built to supply regional demand, centred around Norwich and Ipswich, and fed from our Bramford Substation.<br>Although the network in East Anglia can accommodate the level of generation and demand that there is today, this |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | Applicants should not be required to demonstrate the need for renewable or low carbon energy development and electricity network infrastructure. Where proposals for this form of development come forward outside areas which have been identified as suitable for them they should be acceptable when assessed against the national decision-making policies in this Framework, taken as a whole.<br>Where development is expected to be time-limited, applications should be accompanied by proposals for decommissioning and site restoration, including details of how these measures are expected to be implemented | situation will change over the next decade. Growth in offshore wind generation and interconnectors to Europe has seen a significant number of connections planned in the East Anglian and south-east coastal areas of England.<br>The existing transmission network infrastructure in the East Anglian and south-east areas was not originally designed to accommodate such large volumes of generation capacity.<br>As such the network will require significant reinforcements both in the form of new substations and transmission circuits to provide connections for these new customers and to ensure that power can be transferred securely to the onshore demand centres to meet the needs of electricity consumers in Britain.<br>In November 2024, the National Energy System Operator (NESO) published Clean Power 2030: Advice on achieving clean power for Great Britain by 2030 (NESO, 2024). This report states that 'Three projects have been identified as critical to delivering a network which supports the clean power pathways, but at present have delivery dates after 2030. Support is therefore needed to bring these projects forward for 2030 delivery. These are projects in East Anglia and in the southeast that are critical for connecting offshore wind in the North Sea and supporting the flow of clean power. Our assessment suggests that without these projects, the clean power objective would not be achieved, leaving the clean power target short by around 1.6% in 2030 (assuming a typical weather year) and consumers could face extra constraint costs of around £4.2 billion in 2030.' The Project is specified as two of those three projects. The critical and urgent nature of the project is therefore also recognised in the strongest terms in a recent report in achieving Clean Power 2030 objectives.<br>It is clear that there is a compelling case and established need for the Project and that it will deliver national economic, social |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | | and environmental benefits in line with the Government's clear objectives of delivering sustainable development. |
| **Section 11: Facilitating the sustainable use of minerals** | | |
| Policy M6 Safeguarding mineral resources and infrastructure through decision-making | 1. Proposals for non-mineral development should not: a. Constrain likely or foreseeable future use for mineral working in a Mineral Safeguarding Area; or<br>b. Prevent the use of existing, planned and potential sites for:<br>i. the bulk transport, handling and processing of minerals;<br>ii. the manufacture of concrete and concrete products; or<br>iii. the handling, processing and distribution of substitute, recycled and secondary aggregate material.<br>2. Where proposals for non-mineral development are located within a Minerals Consultation Area, the decision-making authority should consult the mineral planning authority and take account of the local minerals plan before determining the planning application.<br>3. The prior extraction of minerals, where practical and environmentally feasible, should be approved where it would prevent the sterilisation of minerals deposits as a consequence of other forms of development proposals or allocations. | A Minerals Resource and Infrastructure Assessment has been undertaken to support the assessment undertaken and is presented in **ES Appendix 9.2 [APP-183]**. Large parts of the Order Limits are located within either a MSA or an MCA for sand and gravel and/or brick clay. The MSA and MCA both extend beyond the Order Limits, across substantial areas of Norfolk, Suffolk, and Greater Essex. The Project has sought to avoid and reduce effects on sensitive environmental features/receptors through its design process. The prior or incidental extraction of minerals would significantly increase the magnitude of environmental effects created by the Project and would lengthen the duration of construction works in sensitive areas, such as Dedham Vale National Landscape. The environmental impact associated with extracting the minerals is considered to be disproportionate to the value gained from extracting the minerals |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| **Section 13** | **Protecting Green Belt Land- National decision-making policies** | |
| GB6: Control of development in the Green Belt | 1. Development in the Green Belt is inappropriate unless it falls within one of the categories in policy GB7.<br>2. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Such circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposed development, is clearly outweighed by other considerations. In making this assessment, substantial weight should be given to the harm to the Green Belt which would be caused, including harm to its openness.<br>3. In the case of proposals for renewable and low carbon energy development, very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources. | This policy redrafts current Framework paragraphs 153 and 160 to clarify the approach to inappropriate development in the Green Belt. It consolidates considerations relating to inappropriate development so that the expectation to give substantial weight to harm applies only to such development.<br>The Project includes works within the Metropolitan Green Belt. The works include an overhead line comprising standard and low height pylons, a new Tilbury North Substation and new CSE compounds. As outlined in Chapter 7 of the **Planning Statement [APP-085]**, National Grid considers that the proposed overhead line comprises an engineering operation and should therefore not be regarded as inappropriate development in the Green Belt provided that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.<br>Notwithstanding the above, even if the overhead lines were considered to be inappropriate development (which is not accepted by the Applicant as set out in **5.6 Planning Statement [APP-085]** ), it is nevertheless considered that there are very special circumstances which justify their acceptability. Paragraphs 7.3.497 to 7.3.537 of the **5.6 Planning Statement [APP-085]** consider the Project's compliance with Green Belt policy. It is National Grid's position that the proposed Tilbury North Substation and CSE compounds may be considered to be inappropriate development in the Green Belt. The **5.6 Planning Statement [APP-085]** details the Very Special Circumstances applicable in this instance to justify inappropriate development.<br>Subsection 3 of Policy GB6 notes that in the case of proposals for renewable and low carbon energy development, very special circumstances may include the wider environmental |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | | benefits associated with increased energy from renewable sources. Within the application for development consent, the **Planning Statement [APP-085]** does adopt this approach in justifying the development of the Tilbury North Substation as development which may be considered as being inappropriate in the Green Belt.<br><br>Whilst the Project is not a renewable energy project, Norwich to Tilbury is a vital part of the transition to net zero. Due to the growth in offshore wind generation, there has been a significant number of connections planned in the East Anglian. As such, the network requires significant reinforcement to provide the connections of more offshore wind on the east coast. Accordingly, it is considered that this need case provides the very special circumstances to justify development in the Green Belt.<br><br>The Planning Statement concludes that there are very special circumstances to justify inappropriate development in the Green Belt which include:<br><br>• The UK Government policy requires significant reinforcement of the transmission system to facilitate the connection of renewable energy sources to transport electricity to where it is used<br><br>• The British Energy Security Strategy sets targets for the connection of up to 50GW of offshore wind by 2030s as a key part of a strategy for secure, clean and affordable British energy for the long term<br><br>• New connections for offshore wind and nuclear power generation projects, and for interconnectors, are expected into East Anglia by 2030. These connections are being constructed or expected to connect into substations at Necton, Norwich Main, Bramford, Friston and Sizewell |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | | • Without reinforcement, the capacity of the East Anglia existing network is insufficient to accommodate the connection of the proposed new power sources. Therefore, reinforcement of the network is required.<br>• The requirement to meet net zero by 2050, to replace the fossil fuels that once powered the economy to low-carbon electricity<br>• By reinforcing the capacity of East Anglia, the Project will address the need to be able to accommodate the connection of the proposed new power sources, namely offshore wind and nuclear power generation projects, as required by 2030<br>• The Clean Power 2030 Report (NESO 2024) states that 'Three projects have been identified as critical to delivering a network which supports the clean power pathways, but at present have delivery dates after 2030. Support is therefore needed to bring these projects forward for 2030 delivery. These are projects in East Anglia and in the southeast that are critical for connecting offshore wind in the North Sea and supporting the flow of clean power. Our assessment suggests that without these projects, the clean power objective would not be achieved, leaving the clean power target short by around 1.6% in 2030 (assuming a typical weather year) and consumers could face extra constraint costs of around £4.2 billion in 2030.' The Project is specified as one of those three projects. The critical and urgent nature of the Project is therefore also recognised in the strongest terms in a recent report in achieving Clean Power 2030 objectives.' Norwich to Tilbury is comprises two of the three projects. |
| GB7: Development | The following categories of development are not inappropriate in the Green Belt, and therefore | The **Planning Statement [APP-085]** includes an assessment to determine whether the Project may be inappropriate |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| which is not inappropriate in the Green Belt | should not be regarded as harmful to the Green Belt or required to demonstrate very special circumstances:<br>Development which is for agriculture, horticulture and forestry;<br>The re-use, extension, alteration or replacement of an existing building, provided that:<br>the existing building is of permanent and substantial construction; and<br>the extension or alteration will not result in a disproportionate increase in size over and above the size of the original building49; or<br>in the case of proposals for a replacement building, it is in the same use and not materially larger than the one it replaces.<br>Limited infilling in villages;<br>Limited affordable housing for local community needs under policies set out in this Framework or the development plan (for instance, on a rural exception site);<br>The redevelopment of previously developed land (including a material change of use to residential or mixed-use including residential), which would not cause substantial harm to the openness of the Green Belt;<br>Certain other forms of development provided the impact on the openness of the Green Belt is minimised, and there would not be a significant conflict with the Green Belt purposes. These are:<br>mineral extraction; | development within the meaning of Green Belt policy; and if the Project (or any part of it) may be inappropriate development, and demonstrating that very special circumstances exist, meaning that the harm by reason of inappropriateness and any other harm, is outweighed by other considerations.<br>To connect a new transmission connection into Tilbury Substation, it will be necessary to route through the Metropolitan Green Belt. National Grid has considered the effects on the Green Belt and all of the options connecting into Tilbury identified in the Corridor and Preliminary Routing and Siting Study (CPRSS) (National Grid, 2022) would result in new and upgraded infrastructure in the Green Belt.<br>The National Electricity Transmission System (NETS) transports energy from where it is generated to where it is used, in homes, schools, hospitals, businesses, and factories. Electricity networks are an established feature in our landscapes, taking energy across open countryside to towns and cities where it is needed. To ensure the national electricity network can transport energy efficiently there are numerous electricity transmission connections crossing Green Belts. Many of these connections are by way of overhead lines. By their nature, electricity transmission infrastructure (overhead lines) within the Green Belt is inevitable due to the need to transport energy around the country and the need to avoid the most built-up areas around our towns and cities (Holford Rule Supplementary Note 1).<br>Some electricity infrastructure such as overhead lines, are considered to be engineering operations. The amendment of the policy wording to include a specific reference to electricity network infrastructure is a welcome addition. It is noted that the definition of electricity network infrastructure provided in Annex B (glossary) includes components such as substations and |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | engineering operations;<br>transport, electricity network and water infrastructure required in a Green Belt location;<br>development brought forward under a Community Right to Build Order or Neighbourhood Development Order;<br>material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and<br>the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments.<br>Development where all of the following apply:<br>the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;<br>there is an evidenced unmet need for the type of development proposed;<br>the development would be in a sustainable location, with particular reference to policy TR3 of this Framework; and<br>In the case of major development involving the provision of housing, the development proposed complies with policy GB8;<br>Development for housing and mixed-use development which would: | thereby extends the scope of what is not inappropriate development in the Green Belt. This provides greater certainty and places less reliance on demonstrating 'very special circumstances'.<br>By the nature of their design, and the sensitive siting, some of this infrastructure such as pylons and conductors may not be considered inappropriate development in the Green Belt as they do not conflict with Green Belt purposes and preserve openness. Although overhead lines may occupy long corridors within Green Belt, they involve little physical change to the land through which they pass and leave a large majority of the land beneath them free from development and therefore open.<br>Notwithstanding the above, the NPS EN-1 Paragraph 4.2.16 sets out that where a Project is CNP Infrastructure the Secretary of State will take as a starting point for decision making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. NPS EN-1 Paragraph 4.2.17 identifies that this assumption includes where development is within a Green Belt and requires very special circumstances to justify development. The very special circumstances are identified within the Green Belt assessment contained within Chapter 7 of the **Planning Statement [APP-085].** |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | be within reasonable walking distance of a railway station capable of providing a high level of connectivity to services and employment;<br>be physically well-related to a railway station or a settlement within which the station is located;<br>be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure;<br>not prejudice any proposals for long-term comprehensive development in the same location;<br>in the case of major development, comply with policy GB8. | |
| GB8: The Golden Rules | Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, all of the following contributions ('Golden Rules') should be made:<br>Affordable housing which reflects either:<br>development plan policy requirements for major development on land within or released from the Green Belt (as established under policy HO5(1)(a)(iii)); or<br>until such policies are in place, a contribution which is 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of a 50%54. In the absence of a pre-existing requirement for affordable housing, a 50% affordable housing contribution should apply by default. | The Golden Rules are not considered to be relevant to infrastructure proposals. However, a number of Environmental Areas' have been identified for creation across the Project as part of on-site mitigation. Multifunctional areas were prioritised, providing mitigation or enhancements for different environmental aspects i.e. sites where landscape mitigation and biodiversity gains could be achieved together. National Grid would retain ownership of these Environmental Areas and therefore National Grid can commit to a 30-year habitat management and monitoring plan. The areas are identified in the **Outline LEMP [AS-046].** |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | Necessary improvements to local or national infrastructure; and<br>The provision of new green space, or improvements to existing green space, which is accessible to the public. New residents should be able to access good quality green spaces within a short walk of their homes, whether through on-site provision or through access to offsite spaces. This provision should:<br>make a positive contribution to the landscape setting of the development;<br>support nature recovery; and<br>meet local standards for green space provision where these exist in the development plan. Where no locally-specific standards exist, development proposals should meet national standards relevant to the development (these include Natural England standards on accessible green space and urban greening factor and Green Flag criteria). Where land has been identified as having potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes.<br>Where major development involving the provision of housing on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, complies with the Golden Rules, this should be given substantial weight in considering whether to grant planning permission.<br>There are only three circumstances in which a site-specific viability assessment may be justified to | |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | allow the contributions expected by this policy to be adjusted, which are where a development proposal is:<br>On previously developed land;<br>For a multi-phase, strategic site; or<br>For a development model which is of a wholly different type to that assumed in the viability assessment that informed the development plan.<br>Where the circumstances in paragraph 3 of this policy apply, development should still make the maximum possible contribution to affordable housing and other infrastructure requirements. | |
| **Section 14** | **Achieving well-designed places- National decision-making policies** | |
| DP3: Key principles for well-designed places | To respond to their context and create well-designed places development proposals should55:<br>Context: respond to the history, character and features of the site and its setting, so that it integrates into and enhances its surroundings (such as through the arrangement of development plots and buildings, the use of materials and architectural features, and the restoration, reuse and integration of heritage assets). This should not preclude innovation and change where appropriate, especially where an increased scale or density of development is justified in accordance with policies L2 and L3;<br>Liveability: support healthy, mixed, vibrant and integrated communities, which will function well over the lifetime of the development, by incorporating a range of uses and tenures, | The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. National Grid has also considered alternative design suggestions made in written representations, during consultation feedback from external stakeholders.<br>The design considerations have taken place within the context of meeting National Grid's duty to be economical and efficient and also within the rigorous health and safety processes that National Grid has in place that govern how it designs and constructs its projects safely.<br>Regard has also been had to the Horlock and Holford rules in respect to the siting of new transmission infrastructure and substations, as described in detail in the **Planning Statement [APP-085], Design and Access Statement [APP-353] and** |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | employing features which promote social interaction, and which are robust, durable and easy to look after;<br>Climate: contribute to climate change mitigation and adaptation and the transition to net zero, by using building layouts, building orientation, massing, landscaping and materials which conserve energy and other resources, and which minimise risks from the impacts of climate change including overheating;<br>Nature: incorporate and/or connect to a network of high quality, accessible, multi- functional green infrastructure to provide opportunities for recreation and healthy living, strengthen habitats, improve climate resilience and improve air and water quality. This should include maintaining and enhancing tree cover and incorporating sustainable drainage systems in accordance with policies NE3 and F8;<br>Movement: provide transport infrastructure and choices which support the design vision for the site, provide good connections to the wider settlement (or those nearby), and prioritise walking, wheeling, cycling and public transport;<br>Built Form: use the pattern of buildings to define the arrangement of streets, squares and other spaces, promote compact forms of development to optimise the site's potential, distinguish between public and private areas, create focal points and, where appropriate, enhance views into and out of the scheme;<br>Public Space: include spaces that are safe, secure, inclusive, accessible for all ages and abilities and | **Design Approach for Site Specific infrastructure [APP-354]**.<br>The **Design Approach for Site Specific Infrastructure (DASSI) [APP-354]** relates to the details of the site specific infrastructure of the non-linear works included in the Project, such as the substations and CSE compounds. This document outlines the design principles that can be taken forward into the detailed design stage, sets out an approach to the design of site-specific infrastructure of non-linear works, and details those elements of the design which have some flexibility in their appearance.<br>The **Design and Access Statement [APP-353]** provides an overview of the relevant national and local policy and physical context within which the design proposals have evolved. It sets out the design principles applied by National Grid and summarises its approach to good design. The report sets out the proposals and how the design has evolved through public consultation with a focus on the overhead lines. |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | which facilitate and encourage social interaction, play and healthy lifestyles (for example by providing high quality, clear and legible pedestrian and cycle routes, a variety of recreational spaces and places to meet, and making building entrances and windows face onto streets and other public spaces to provide natural surveillance); and<br>Identity: create visually attractive, distinctive and characterful development to establish or maintain a strong sense of place and pride, including through the use of a coherent palette of materials, design features and planting.<br>Development proposals that are not well designed should be refused, when assessed against this policy and local design policies, guides, codes and masterplans set out in the development plan. Substantial weight should be given to compliance with these policies when assessing the design quality of proposals.<br>The principles set out in the Design and Placemaking planning practice guidance should be used to inform how this policy is applied in the absence of locally-produced design policies, guides, codes or masterplans.<br>Substantial weight should also be given to outstanding or innovative designs which promote high levels of sustainability, or which help raise the standard of design more generally in an area, so long as they are consistent with the overall form and layout of their surroundings. | |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| DP4: The Design process | Design quality should be considered throughout the evolution, assessment and delivery of development proposals, including through any pre-application engagement; as outlined in Part 2 of the Design and Placemaking planning practice guidance.<br>The local planning authority should:<br>Ensure that they have access to, and encourage the appropriate use of design review and other design tools and processes (especially for significant projects such as major housing and mixed-use developments), and take into account their outcomes, including any design recommendations made by design review panels;<br>Make sure that relevant planning conditions refer to clear and accurate plans and drawings which provide visual clarity about the design of the development, including the approved use of materials where appropriate; and<br>Not allow the quality of approved development to be materially diminished between permission and completion, as a result of changes proposed following its initial approval (for example through changes to approved details). | The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. National Grid has also considered alternative design suggestions made in written representations, during consultation feedback from external stakeholders.<br>The design considerations have taken place within the context of meeting National Grid's duty to be economical and efficient and also within the rigorous health and safety processes that National Grid has in place that govern how it designs and constructs its projects safely.<br>Regard has also been had to the Horlock and Holford rules in respect to the siting of new transmission infrastructure and substations, as described in the **Planning Statement [APP-085], Design and Access Statement [APP-353] and Design Approach for Site Specific infrastructure [APP-354]**. |
| **Section 15** | **Promoting sustainable transport- National decision-making policies** | |
| TR3: Locating development in sustainable locations | So that development is located where it can support sustainable patterns of movement, enable good accessibility for different users and make the most of existing and proposed transport infrastructure, development proposals should reflect the following principles, taking into account the vision for the site, the type of development and its location: | The **Transport Assessment [APP-333]** assesses the potential for disruption to infrastructure during construction. The Project is expected to generate very low level vehicle movements during operational and maintenance phase, therefore operational effects to the transport network have been scoped out of the assessment due to the low vehicle numbers anticipated during operation. The conclusions presented in **ES** |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | Development proposals which could generate a significant amount of movement, in the context of the area within which they would be situated, should be in locations that are, or can be made sustainable, by limiting the need to travel and offering a genuine choice of transport modes for residents and users, unless the nature of the use makes this impractical;<br>Opportunities should be taken to utilise existing or proposed transport infrastructure in optimising the amount or density of development which can be accommodated in different locations, especially where this can support more walking, wheeling, cycling and public transport use;<br>The environmental impacts of traffic and transport infrastructure should be identified, assessed and taken into account – including taking opportunities to avoid or mitigate any adverse environmental effects, and to secure net environmental gains such as reductions in air pollution;<br>In rural areas, opportunities to improve wheeling, cycling and public transport and enhance the connectivity of an area should be taken where they exist and can be supported by the development proposed.<br>The Connectivity Tool (Connectivity Tool - GOV.UK) should be used alongside other relevant evidence in assessing the connectivity of particular locations proposed for development. | **Chapter 16: Traffic and Transport [APP-271]** demonstrate that with mitigation measures, the assessment of traffic generated during construction of the Project will not result in significant adverse effects on road users, equestrians, walkers, cyclists and horse riders and road links in terms of delay, severance, amenity, fear and intimidation, accidents and road safety, and parking and loading. Embedded mitigation measures comprise of the inclusion of a largely continuous haul road to be used by construction vehicles reducing construction traffic on the local road network.<br>As with all major infrastructure projects, construction of the Project will require the use of additional vehicles, although these will be low in any given month and will also be spread across the extent of the Order Limits, to limit the effect in any geographical area. The **Outline CoCP [APP-300]** contains a list of embedded, standard and additional mitigation measures and environmental commitments relating to air quality. With the good practice measures in place, no significant effects on air quality are anticipated. Embedded mitigation measures comprise of the inclusion of a largely continuous haul road to be used by construction vehicles reducing construction traffic on the local road network. **ES Chapter 16: Traffic and Transport [APP-271]** concluded that with mitigation measures, no significant adverse effects on sensitive receptors including PRoW, and on the use and safety of the road network, are anticipated during construction |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| TR6: Assessing transport impacts | Development proposals that are likely to generate significant amounts of movement should be supported by:<br>A transport statement or transport assessment (depending on the extent and significance of the transport issues involved), proportionate to the nature and scale of the development, so that the likely impacts of the proposal for transport can be assessed and monitored; and<br>A travel plan, indicating how sustainable transport objectives will be delivered, monitored and manged over time.<br>Transport assessments and statements, and travel plans, should reflect the transport vision for the development and how it is intended to be achieved (including, in the case of Travel Plans, identifying fallback options if initial measures do not deliver the expected outcomes).<br>All development proposals should be capable of proceeding without having a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety, taking into account any mitigation measures proposed as well as any wider network improvements.<br>In assessing potential impacts, all reasonable future scenarios should be considered, taking into account impacts at different times of the day, potential cumulative impacts, multimodal trip generation and the promotion of sustainable modes of travel, and | **Appendix B Outline Construction Worker Travel Plan of the Outline Construction Traffic Management Plan (CTMP) [APP-311]** contains the Travel Plan, setting out the good practice measures that will be in place to encourage sustainable transportation for the workforce, in a way that reduces both environmental and social impacts on the local area. The objective of the Travel Plan is to encourage a reduction in the quantity of single-occupancy car journeys and to create a shift towards more sustainable modes of transport. **ES Chapter 16: Traffic and Transport [APP-271]** and **ES Chapter 17: Cumulative Effects [APP-281]** identifies other developments which together with the Project could result in a cumulative impact to the highway network. The **Transport Assessment [APP-333]** assesses the potential for disruption to infrastructure during construction. The Project is expected to generate very lowlevel vehicle movements during operational and maintenance phase therefore operational effects to the transport network have been scoped out of the assessment. As with all major infrastructure projects, construction of the Project will require the use of additional vehicles, although these will be low in any given month and will also be spread across the extent of the Order Limits, to limit the effect in any geographical area. The **Outline CoCP [APP-300]** contains a list of embedded, standard and additional mitigation measures and environmental commitments relating to air quality. Embedded mitigation measures comprise of the inclusion of a largely continuous haul road to be used by construction vehicles reducing construction traffic on the local road network. As a result of all measures introduced, there are not predicted to be any significant adverse traffic and transport effects. |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| | realising the transport vision for the development itself. | |
| TR8: Public rights of way | Development proposals should:<br>Maintain the network of public rights of way, including through suitable diversions agreed with the highway authority; and<br>Take opportunities to extend, link or improve the quality of existing routes where this enables one or more of the following:<br>improved access to green spaces and the countryside;<br>new direct and circular routes and connections between local and long-distance footpaths, bridleways and cycle routes;<br>the provision of accessible, safe and convenient links to services and facilities; and<br>improved connections with public transport stops and interchanges. | The **Outline PRoW Management Plan [APP-329]** provides a list of each of the affected PRoWs and the proposed management proposals. The Project is not expected to result in any permanent closures or diversions of footways or the cycle network as a result of the construction activities of the Project. A limited number of temporary diversions and crossing points are required for PRoW affected by the construction of the Project. The **Outline Public Rights of Way (PRoW) Management Plan [APP-329]** explains the details of the temporary short-term diversions and appropriate measures for the management of PRoW during the various stages of the Project. The assessment in **ES Chapter 16: Traffic and Transport [APP-271]** concluded that a short term neutral or minor adverse effect is expected on all PRoW from pedestrian, cyclist and horse-rider delays, and overall these are therefore expected to be not significant. The assessment also concludes that with mitigation measures, no significant adverse effects on sensitive receptors including PRoW, and on the use and safety of the road network, are anticipated during construction. Details of the strategy for PRoWs and the management regimes can be found within the **Outline PRoW Management Plan [APP-329]**. The effects on PRoW during construction will be short term and will be managed by National Grid through measures set out in the **Outline PRoW Management Plan [APP-329]**. Whilst PRoW diversions are required, these have been designed to minimise additional journey distances, re-join existing routes and improve route connectivity. |
| Policy HC7: Development affecting | 1. Development proposals should not result in the loss of existing open space, sports and recreational buildings and land, including playing fields, other | The Order Limits have been designed to avoid built development and proposed development allocations in adopted and emerging local plans, including allocated and |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| existing recreation facilities | formal and informal play space and allotments, unless: a. An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or<br>b. The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and/or quality, in a location which offers comparable or improved accessibility for the community it serves; or<br>c. The development is for alternative sports, play or other recreational provision, the benefits of which clearly outweigh the loss of the current or former use. | identified open space. However, on occasion, it is necessary for the overhead line to pass through open space to avoid settlements and conflicts with other developments.<br>In the case of Open Space specifically, the Project has taken a precautionary approach to the identification of potential open space. An assessment of the Project impacts on Open Space is presented in **Chapter 7 and Appendix B of the Planning Statement [APP-085]**. In the case of green infrastructure assets, the Project will avoid as far as possible impacts to such green infrastructure assets, and the ES has determined that there are no significant long-term effects which are relevant in this respect |
| HC8: Development affecting Local Green Space | Development proposals for land which has been designated as Local Green Space should be determined in a manner consistent with the relevant national decision-making policies for land in the Green Belt, excluding provisions relating to grey belt and previously developed land. | In line with national policy requirements, the Project has been designed following the mitigation hierarchy and has avoided impacts where possible through the routeing and siting process. Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features as far as reasonably practicable.<br>The Project does cross two area of local green spaces designated in the adopted Ardleigh Neighbourhood Plan. The local green space at Glebe Corner will be subject to undergrounding existing UKPN overhead line infrastructure. These works will result in a temporary impact on this local green space. The local green space at the fishing lake north of Colchester Road is oversailed by the Project. For safety considerations this will prevent fishing activities. An assessment of this loss is reported in **Appendix B: Open Space Assessment in the Planning Statement [APP-085] The Design Development Report [APP-122]** outlines the alternative alignments which were considered to avoid |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| | | oversailing the area of local green space. Alternatives to avoid oversail of the water body, to allow continuation or intensification of angling were considered. These would necessitate multiple changes of direction, give routeing constraints and the presence of residential properties, whether passing to the east (residential properties within 200 m) or west (residential properties within around 100 m) of the water body. These multiple angle changes would reduce consistency with the Holford Rules and increase effects to multiple residential properties close to the alignment in this area. Due to the limited and informal level of angling activity and the additional environmental effects from the alternatives, retain the straighter 2023 preferred draft alignment and oversail the waterbody was preferred although recognising that this would terminate the informal angling arrangements. Acknowledging that local green spaces enjoy the same protection as Green Belt in England; National Grid have stated that their position in the **Planning Statement [APP-085]** that overhead lines comprise an engineering operation and should be regarded as not inappropriate in the Green Belt. However, were this approach to be challenged it is considered that the Need Case for the Project presented in the **Strategic Options Backcheck and Review [APP-355]** demonstrates the very special circumstances for the Project. |
| **Section 17:** | **Pollution, public protection and security** | |
| | National decision-making policies | |
| P2: Ground Conditions | Sites proposed for development should be suitable for their proposed use taking account of:<br>Ground conditions and any risks arising from land instability or contamination (whether due to natural | **ES Appendix 9.1: Baseline Information and Preliminary Contamination Risk Assessment [APP-182]** describes the known areas where a risk of contamination has been identified. This notes that the majority of the Order Limits and Study Area appears to have remained as “undeveloped” agricultural land |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | hazards or current and former activities such as mining or fuel storage); and<br>The extent to which any such risks can be mitigated, and the potential impacts on the natural environment arising from remediation.<br>Where land is remediated it should, as a minimum, not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990.<br>Adequate site investigation information, prepared by a competent person, should be available to inform these assessments.<br>Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner. | and farm buildings since the earliest historical mapping reviewed, dating from the 1880s. In these areas it is considered that there is a very low risk of potential sources of significant existing contamination and therefore they are not considered further.<br>There are discrete areas within the Study Area that have a history of potentially contaminative land use or where the current land use is potentially contaminative. Where these areas are identified, readily available information relating to the Potential Sources of Contamination (PSC) has been gathered and a preliminary contamination risk assessment has been carried for each potential contamination source.<br>The **Outline CoCP [APP-300]** sets out the measures that would be taken to deal with unexpected contamination identified during construction. |
| P3: Living conditions and pollution | 1. Development proposals should:<br>a. Be appropriate for their location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts which could arise from the development;<br>b. Provide healthy living conditions for occupiers and users in terms of having adequate access to light and avoiding exposure to levels of air, noise, artificial light or other sources of pollution which could have an unacceptable adverse effect on health and wellbeing; and<br>c. Not give rise to, or contribute to, an unacceptable level of access to daylight and sunlight for | **ES Chapter 10: Health and Wellbeing [APP-192]** includes an assessment of the likely significant effects from noise and vibration referenced in **ES Chapter 14: Noise and Vibration [APP-256]** during the construction and operation of the Project. This has identified that there would be no residual effects on health and quality of life from noise with the good practice measures and mitigation in place.<br>**ES Chapter 7: Air Quality [APP-147]** presents the assessment of the likely significant air quality effects that could result from the Project. During the construction phase, construction machinery and vehicles could generate dust and fine particulate matter, particularly through earthwork and soil stripping activities. Machinery and vehicles would also emit exhaust emissions through the combustion of fossil fuels. There is limited potential for the Project to generate dust and |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| | neighbouring residents and occupiers, or unacceptable levels of air, noise, artificial light, water, soil or other forms of pollution on or beyond the site.<br>2. Within this context development proposals should:<br>a. Mitigate the effect of existing pollution on the site where necessary to secure acceptable conditions for occupiers and users and, where possible, take opportunities to reduce pollution affecting the wider area (such as through traffic and travel management or improved external lighting). In doing so consideration should be given to the cumulative effect of pollution from multiple sources, and to whether the intended occupiers or users may be particularly vulnerable to its effects, such as children and older people;<br>b. Sustain and contribute to compliance with relevant limit values or national objectives and targets for air pollutants including PM2.5, taking into account the presence of Air Quality Management Areas and NO2 Clean Air Plans. Where a development proposal falls within or could affect an Air Quality Management Area or Clean Air Plan (Including any Clean Air Zone), it should be consistent with the objectives of these plans and the local air quality action plan;<br>c. Not result in levels of noise exposure which would have a significant observed adverse effect, and maintain the character of tranquil areas (those that have remained relatively undisturbed by noise | emissions during the operational phase, due to the limited activities associated with inspection and maintenance, therefore, this has been scoped out of the assessment. A construction dust risk assessment has been undertaken and is reported in **ES Appendix 7.3: Air Quality Assessment Results [APP-150].**<br>The proposed lighting requirements for the Project are described in **ES Chapter 4: Project Description [APP-130]** and subject to assessment in **ES Chapter 8: Ecology and Biodiversity [AS-026] and Chapter 13: Landscape and Visual [APP-226].** No residual significant effects in respect of lighting are expected during the construction and operational phase of the Project.<br>The Project will be constructed and operated in compliance with all relevant legislation, consents and permits. Table 5.1 of the **Outline CoCP [APP-300]** identifies the anticipated licences, assents, consents and permits required for the Project. Further details can be referred in **Consents and Licences Required Under Other Legislation [APP-084].**<br>An **Outline CoCP [APP-300]** has been submitted as part of the application for development consent. This sets out the actions and measures that would be implemented to reduce the risk of a pollution incident along with proactive actions that would be taken should any pollution incident occur. |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | from human sources and are prized for their recreational and amenity value for this reason);<br>d. Limit any adverse impact from artificial light on local amenity, intrinsically dark landscapes (those entirely, or largely, uninterrupted by artificial light) and nature; and e. Assess and mitigate impacts where the development could have an unacceptable adverse effect on water quality, especially where this concerns sensitive water bodies such as chalk streams.<br>3. In applying this policy, it should not be assumed that other regimes for the control of pollution will necessarily eliminate emissions completely. | |
| **Section 18** | **Meeting the challenge of climate change, flooding and coastal change- National decision-making policies** | |
| F4: Assessing flood risk for decision-making | 1. To inform the assessment of flood risk and, where relevant, appropriate mitigation, a site specific flood risk assessment should accompany all development proposals in Flood Zones 2, 3a, and 3b as defined in Annex F, table 1.<br>2. In Flood Zone 1, a site-specific flood risk assessment should inform and accompany all development proposals involving:<br>a. Sites of 1 hectare or more;<br>b. Land which has been identified by the Environment Agency as having critical drainage problems;<br>c. Land identified in a strategic flood risk assessment or the Flood Map for Planning as being at increased flood risk in future; or | The application for development consent includes a flood risk assessment. The **FRA [APP-331]** considers the risk of flooding from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. As detailed within the FRA flooding from other sources such as sewers, reservoirs and other artificial sources are scoped out of the assessment. National Grid also circulated a draft version of the FRA to the Environment Agency, IDB and LLFA ahead of the submission of the application for development consent for their consideration and comment. Subsequently, the consultees' feedback was taken into consideration whilst preparing the submission version of the FRA.<br>All of the proposed new substations and extensions to existing substations are located in Flood Zone 1. Six of the proposed CSE compounds are located in Flood Zone 1. The CSE compound site at Wenham Grove is partially situated in Flood Zone 3 following the release of updated flood mapping dataset |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | d. Land subject to a current risk of flooding from any source, where its development would introduce a more vulnerable use than the existing one.<br>3. Site-specific flood risk assessments should be appropriate to the scale, nature, and location of development and should, where relevant, support an assessment of whether a development proposal satisfies the sequential and exception tests set out in policies F5 and F6 | from the Environment Agency. This CSE compound would be laid out in accordance with the sequential approach, whereby the most vulnerable components are located in areas at lowest risk of flooding. The requirements for compensation of loss of floodplain storage associated with the pylons is addressed in the following sub-section and secured by commitment W17 in the **Outline CoCP [APP-300]**. No discernible loss of floodplain storage is associated with the CSE compound, associated above ground infrastructure has a very limited footprint.<br>The **FRA [APP-331]** has concluded that the Project during its construction would be generally at low risk of flooding from rivers. Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures set out in the **Outline CoCP [APP-300**]. These measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk as set out in **ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]**. During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the FRA. Above ground structures such as pylons and below ground structures such as the underground cable are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. |
| F5: The sequential test | 1. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Where the test applies, development proposals should not be located in | The Sequential Test encourages the location of new development in areas at low risk of flooding, the analysis contained within the **Flood Risk Assessment [APP-331]** demonstrates that the majority of the Project lies within Flood |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | areas at risk of flooding where alternative sites, appropriate for the development, are reasonably available in areas with a lower risk of flooding. The area to which the test is applied should not be greater than the anticipated catchment of the development in terms of its likely occupiers or users.<br>2. The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, other than for:<br>a. Sites allocated in the development plan which were subject to the sequential test during plan preparation;<br>b. Sites where a site-specific flood risk assessment demonstrates clearly that:<br>i. no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk); or<br>ii. where the site would be at risk of surface water flooding only, the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development without increasing flood risk elsewhere in accordance with policy F7.<br>c. For the following types of development:<br>i. householder development; | Zone 1 and in zones that are at low risk of flooding from other sources. This has been achieved through an iterative process of design informed by detailed routeing and siting studies and stakeholder feedback. However, given the linear nature of the Project and its large geographical scale, avoidance of all areas of fluvial floodplain and areas at risk of surface water flooding is not practicable and therefore no suitable alternative sites are available for the parts of the Project in higher flood risk areas. Works in these areas however are largely temporary, associated with construction of the Project, and during its operation (and maintenance) are limited to a small number of pylons in the fluvial floodplain (that are of low vulnerability to inundation) and areas at risk of surface water flooding on some localised reaches of permanent routes of access.<br>The Exception Test is therefore triggered and is presented in **FRA [APP-331]**. In response to the first part of the Exception Test the need for the Project is explained in the **Strategic Options Back Check and Review Report [APP-355]** and summarised in Chapter 4 of the **Planning Statement [APP-085].**<br>With regard to the first part of the test, the Project is an NSIP that would play an important role in delivering renewable electricity, reliably and safely and will support the UK's move towards net zero. The Project is identified as CNP Infrastructure.<br>With regard to the second test, the permanent works associated with the Project which are within Flood Zone 3 are restricted to a small number of pylons for the overhead lines and a partial area of the Little Wenham CSE compound. These elements would be designed such that they are resilient to flooding, ensuring the Project would be safe and could continue to operate during flood event. A suite of measures |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | ii. small non-residential extensions (with a footprint of less than 250m2 ); and<br>iii. changes of use, other than changes of use to a caravan, camping or chalet site, or to a mobile home or park home site.<br>3. The strategic flood risk assessment covering the area of the proposed development and the Flood Map for Planning should provide the evidential basis for applying the sequential test. | would be adopted to prevent flood risk increases during construction and operation of the Project. Temporary worksites in floodplains would operate in accordance with the protocols detailed in a Flood Warning and Evacuation Plan (Appendix G of the **Outline CoCP [APP-307]**, to safeguard construction personnel and prevent flood damage to construction equipment and materials.<br>In conclusion, the FRA demonstrates that the requirements of NPS EN-1, NPS EN-5 and its associated PPG and relevant local plan policies with respect to flood risk have been met, and the flood risk management measures identified would be secured through the Requirements of the DCO if approved. It can also be concluded that there would be no new or different impacts associated with the design scenarios set out in **ES Chapter 4: Project Description [APP-130]**, including in scenarios where the Project interacts with other development schemes. |
| F6: Development in areas at risk of flooding from rivers or the sea | 1. In areas falling within flood zones 2, 3a, or 3b (as defined in Annex F, table 1):<br>a. Development proposals should be refused if the use is incompatible with the risk from river or sea flooding, as set out in Annex F, table 3; and<br>b. In certain other circumstances shown in Annex F, table 3, in addition to satisfying the sequential test in policy F5 where applicable, development will only be appropriate where an 'exception test' is satisfied. The exception test involves demonstrating that the development would meet all the following criteria:<br>i. provide wider sustainability benefits to the community that outweigh the flood risk; and | The application for development consent is accompanied by an **FRA [APP-331]**. The FRA focuses on fluvial, pluvial (surface water), tidal, and groundwater flood risk. Flooding from sewers, reservoirs and other artificial sources were scoped out of the assessment in agreement with the Planning Inspectorate.<br>A sequential approach has been taken in siting the Project infrastructure (with the sequential test reported in the **FRA [APP-331]**), however due to the linear nature of the Project and its large geographical scale, some parts of the Order Limits necessarily encroach into areas with a medium or high likelihood of flooding.<br>The development is not considered to be incompatible with the risk from river or sea flooding, as set out in Annex F, table 3. |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | ii. be safe for its anticipated lifetime in accordance with policy F7; and iii. not increase flood risk elsewhere and, where possible, reduce flood risk overall.<br>2. The application of the exception test should be informed by a site-specific flood risk assessment. The exception test does not need to be applied:<br>a. To those forms of development, or in those circumstances, where the sequential test is not required, as set out in policy F5; or<br>b. Where development is proposed on a site allocated in the development plan to which the exception test was applied at the plan-making stage, unless there has been a significant increase in the risk of flooding to the site subsequently, or the nature of the development itself has changed significantly from that which was allocated so as to introduce a more vulnerable use (having regard to Annex F, table 2). | An exception test has been produced and this is presented in the **FRA [APP-331]**.<br>With reference to Part 1(b)(i), the Project is an NSIP that would play an important role in delivering renewable electricity, reliably and safely and will support the UK's move towards net zero. The Project is identified as CNP Infrastructure. Accordingly, it is considered that the Project does offer wider sustainability benefits to the community which outweigh the flood risk. It should be noted that the Project is not anticipated to increase flood risk elsewhere during its operation as any losses of floodplain storage would be compensated for, and additional surface water runoff would be managed in line with<br>national and local requirements.<br>With reference to Part 1(b)(ii) the permanent works associated with the Project which are within Flood Zone 3 are restricted to a small number of pylons for the overhead lines and a partial area of the Little Wenham CSE compound. These elements would be designed such that they are resilient to flooding, ensuring the Project would be safe and could continue to operate during flood events. |
| F7: Ensuring development is safe from flooding | 1. Development proposals should not present a risk from flooding to potential occupiers, users, or visitors, and should not increase flood risk elsewhere.<br>2. Where development is proposed in a location known to be at risk from any form of flooding, now or in the future, it should be refused unless:<br>a. Within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons which justify a different arrangement; | The application for development consent is accompanied by an **FRA [APP-331]**. The FRA focuses on fluvial, pluvial (surface water), tidal, and groundwater flood risk.<br>A sequential approach has been taken to siting infrastructure for the Project, particularly those elements that are vulnerable to inundation. The proposed temporary construction compounds and Cable Sealing End (CSE) compounds are located in Flood Zone 1, with one exception concerning a CSE compound site at Wenham Grove that is partially situated in Flood Zone 3 in the updated flood mapping dataset. However, this CSE compound would be situated within the defined Limits of Deviation (LoD) to avoid Flood Zone 3, as secured by commitment W19 within the |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | b. The development will be safe throughout its lifetime taking account of the vulnerability of its users;<br>c. Any residual risk can be safely managed, and safe access and escape routes are included where appropriate, as part of an agreed emergency plan;<br>d. The development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment; and<br>e. It can be demonstrated that flood risk will not be increased elsewhere. | **Outline Code of Construction Practice (CoCP) [APP-300]**. All of the proposed new substations and extensions to existing substations are located in Flood Zone 1. Due to its linear nature and the geographical extent of the Project, some components, namely pylons, must necessarily be located in areas with a medium and high risk of flooding (Flood Zones 2 and 3). The Exception Test is therefore triggered and the **FRA [APP-331]** provides the evidence of how the Project passes this test.<br>Fluvial and surface water (pluvial) sources pose a risk to some temporary construction worksites. These risks would be reduced and managed by implementing a range of mitigation measures set out in the **Outline CoCP [APP-300]**, including those detailed in a **Flood Warning and Evacuation Plan (Appendix G of the Outline CoCP [APP-307]**) and by programming construction activities in floodplains to avoid periods of likely high river levels where practicable. With these measures in place, the residual risk of flooding from these sources during the construction phase has been assessed as low risk. There is no land within the Order Limits that is at risk of tidal flooding. Groundwater flood risk across the Project has been assessed as generally low.<br>During operation (and maintenance) over the Project lifetime, flood risk from fluvial, surface water, tidal and groundwater sources is assessed to be low due to locating key infrastructure in Flood Zone 1 and areas at low risk of flooding from surface and groundwater sources. The residual risk, associated with the pylons in areas of medium to high risk, is assessed as low due to the low vulnerability of this type of infrastructure to inundation.<br>The Project is not anticipated to increase flood risk elsewhere during its operation as any losses of floodplain storage would be compensated for, and additional surface water runoff would be managed in line with national and local requirements. |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| F8: Sustainable drainage systems and watercourses | 1. Development proposals which could affect drainage on or around the development site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, in ways which are proportionate to the nature and scale of the proposal. The systems employed should provide multifunctional benefits wherever possible, facilitating improvements in water quality, biodiversity and amenity.<br>2. Sustainable Drainage Systems should:<br>a. Be designed in accordance with the National Standards for Sustainable Drainage Systems; b. Have maintenance arrangements in place to ensure an acceptable standard of operation for the anticipated lifetime of the development; and c. In the case of proposals for major development, take account of advice from the Lead Local Flood Authority.<br>3. Development proposals should not enclose existing watercourses where this is not already the case, unless there are compelling reasons to do so; and should where possible remove existing culverts and re-naturalise existing river channels, unless to do so would increase flood risk or result in other environmental harm. | In line with measure W08 contained in the **Outline Code of Construction Practice [APP-300]** surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA and adopt sustainable drainage strategies designed to allow for resilience to climate change. These measures would be maintained for the Project's lifetime. Further, surface water drainage features, based on SuDS techniques, would be installed at the CSE compound sites during the construction phase, with access roads also having suitable drainage provisions. In addition to measure W08 in the Outline Code of Construction Practice, Commitment W13 and W14 are also considered to be relevant in demonstrating compliance with this policy. Commitment W13 states that '*Surface water drainage features, based on Sustainable Drainage System (SuDS) techniques, will be installed at sites and laydown areas during construction. These areas will be reinstated after completion of the temporary works, as agreed with the landowner. Access roads and haul roads, as well as areas where impermeable material will be installed where heavy equipment would be used, will also have suitable drainage provisions via appropriate SuDS. Drainage features will provide attenuation and treatment of runoff*'<br>Commitment W14 states that '*Replacement drainage schemes will be installed where appropriate. A specialised drainage contractor(s) will review the drainage designs and the relevant LLFA will be consulted on proposals (where it is not simply a replacement of the existing drainage run)*'<br>The Outline CoCP is secured by Requirement 4 in the **Draft DCO [APP-056].** |
| F6: Development in areas at risk of | In areas falling within flood zones 2, 3a, or 3b (as defined in Annex F, table 1): | The application for development consent includes a flood risk assessment. The **FRA [APP-331]** considers the risk of flooding from fluvial, tidal/coastal, pluvial (surface water) and |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| flooding from rivers or the sea | Development proposals should be refused if the use is incompatible with the risk from river or sea flooding, as set out in Annex F, table 3; and<br>In certain other circumstances shown in Annex F, table 3, in addition to satisfying the sequential test in policy F5 where applicable, development will only be appropriate where an 'exception test' is satisfied. The exception test involves demonstrating that the development would meet all the following criteria:<br>provide wider sustainability benefits to the community that outweigh the flood risk; and<br>be safe for its anticipated lifetime in accordance with policy F7; and<br>not increase flood risk elsewhere and, where possible, reduce flood risk overall.<br>The application of the exception test should be informed by a site-specific flood risk assessment. The exception test does not need to be applied:<br>To those forms of development, or in those circumstances, where the sequential test is not required, as set out in policy F5; or<br>Where development is proposed on a site allocated in the development plan to which the exception test was applied at the plan-making stage, unless there has been a significant increase in the risk of flooding to the site subsequently, or the nature of the development itself has changed significantly from that which was allocated so as to introduce a more vulnerable use (having regard to Annex F, table 2). | groundwater sources. As detailed within the FRA flooding from other sources such as sewers, reservoirs and other artificial sources are scoped out of the assessment. National Grid also circulated a draft version of the FRA to the Environment Agency, IDB and LLFA ahead of the submission of the application for development consent for their consideration and comment. Subsequently, the consultees' feedback was taken into consideration whilst preparing the submission version of the FRA.<br>All of the proposed new substations and extensions to existing substations are located in Flood Zone 1. Six of the proposed CSE compounds are located in Flood Zone 1. The CSE compound site at Wenham Grove is partially situated in Flood Zone 3 following the release of updated flood mapping dataset from the Environment Agency. This CSE compound would be laid out in accordance with the sequential approach, whereby the most vulnerable components are located in areas at lowest risk of flooding. The requirements for compensation of loss of floodplain storage associated with the pylons is addressed in the following sub-section and secured by commitment W17 in the **Outline CoCP [APP-300].** No discernible loss of floodplain storage is associated with the CSE compound, associated above ground infrastructure has a very limited footprint.<br>The **FRA [APP-331]** has concluded that the Project during its construction would be generally at low risk of flooding from rivers. Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures set out in the Outline **CoCP [APP-300]**. These measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk as set out in **ES Chapter 12: Hydrology,** |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | | **Land Drainage and Flood Risk [APP-221]**. During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the FRA. Above ground structures such as pylons and below ground structures such as the underground cable are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement.<br><br>The Sequential Test encourages the location of new development in areas at low risk of flooding, the analysis contained within the **Flood Risk Assessment [APP-331]** demonstrates that the majority of the Project lies within Flood Zone 1 and in zones that are at low risk of flooding from other sources. This has been achieved through an iterative process of design informed by detailed routeing and siting studies and stakeholder feedback. However, given the linear nature of the Project and its large geographical scale, avoidance of all areas of fluvial floodplain and areas at risk of surface water flooding is not practicable and therefore no suitable alternative sites are available for the parts of the Project in higher flood risk areas. Works in these areas however are largely temporary, associated with construction of the Project, and during its operation (and maintenance) are limited to a small number of pylons in the fluvial floodplain (that are of low vulnerability to inundation) and areas at risk of surface water flooding on some localised reaches of permanent routes of access.<br><br>The Exception Test is therefore triggered and is presented in **FRA [APP-331]**. In response to the first part of the Exception Test the need for the Project is explained in the Strategic **Options Back Check and Review Report [APP-355]** and |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | | summarised in Chapter 4 of the **Planning Statement [APP-085].**<br>With regard to the first part of the test, the Project is an NSIP that would play an important role in delivering renewable electricity, reliably and safely and will support the UK's move towards net zero. The Project is identified as CNP Infrastructure.<br>With regard to the second test, the permanent works associated with the Project which are within Flood Zone 3 are restricted to a small number of pylons for the overhead lines and a partial area of the Little Wenham CSE compound. These elements would be designed such that they are resilient to flooding, ensuring the Project would be safe and could continue to operate during flood event. A suite of measures would be adopted to prevent flood risk increases during construction and operation of the Project. Temporary worksites in floodplains would operate in accordance with the protocols detailed in a Flood Warning and Evacuation Plan (Appendix G of the **Outline CoCP [APP-307]**, to safeguard construction personnel and prevent flood damage to construction equipment and materials.<br>In conclusion, the FRA demonstrates that the requirements of NPS EN-1, NPS EN-5 and its associated PPG and relevant local plan policies with respect to flood risk have been met, and the flood risk management measures identified would be secured through the Requirements of the DCO if approved. It can also be concluded that there would be no new or different impacts associated with the design scenarios set out in **ES Chapter 4: Project Description [APP-130]**, including in scenarios where the Project interacts with other development schemes. |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| F7: Ensuring development is safe from flooding | Development proposals should not present a risk from flooding to potential occupiers, users, or visitors, and should not increase flood risk elsewhere.<br>Where development is proposed in a location known to be at risk from any form of flooding, now or in the future, it should be refused unless:<br>Within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons which justify a different arrangement;<br>The development will be safe throughout its lifetime taking account of the vulnerability of its users;<br>Any residual risk can be safely managed, and safe access and escape routes are included where appropriate, as part of an agreed emergency plan;<br>The development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment; and<br>It can be demonstrated that flood risk will not be increased elsewhere. | The impact of climate change, including the risk of flooding, have been considered during the optioneering and design evolution process. **ES Chapter 3: Alternatives [APP-127]** sets out how the Project has been designed to avoid areas of significant flood risk. With the exception of the Wenham Grove CSE Compound, the substations and CSE compounds would be located in Flood Zone 1 - see the **FRA [APP-331]** for further details. The remaining structures, including above ground structures such as pylons and below ground structures such as the underground cable, are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. The permanent drainage design at the substations and the CSE compounds would be developed in liaison with the Lead Local Flood Authority (LLFA). Commitment W08 in the **Outline CoCP [APP-300]** sets out that surface water runoff will be managed in accordance with the requirements and standards of the relevant LLFA. Surface water runoff will be captured using sustainable drainage techniques that will be designed to allow for climate change resilience and with consideration of exceedance flow routes. |
| F8: Sustainable drainage systems | Development proposals which could affect drainage on or around the development site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, in ways which are proportionate to the nature and scale of the proposal. The systems employed should provide multifunctional benefits wherever possible, facilitating improvements in water quality, biodiversity and amenity. | The **Outline CoCP [APP-300]** describes the flood practice measures including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime. The **FRA [APP-331]** states that access roads and haul roads, as well as areas where impermeable material will be installed |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | Sustainable Drainage Systems should:<br>Be designed in accordance with the National Standards for Sustainable Drainage Systems;<br>Have maintenance arrangements in place to ensure an acceptable standard of operation for the anticipated lifetime of the development; and<br>In the case of proposals for major development, take account of advice from the Lead Local Flood Authority. | in areas where heavy equipment would be used, will also have suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff Appendix C of the **FRA [APP-331]** contains further details on SuDS. |
| **Section 19**<br>**Conserving and enhancing the natural environment- National decision-making policies** | | |
| N2: Improving the natural environment | To contribute positively to the natural environment and support nature's recovery development proposals should:<br>Consider the environmental qualities of land proposed for development, including habitats, landscape character and the natural beauty of the countryside, and identify opportunities for those qualities to be conserved or enhanced (including through requirements for biodiversity net gain where these apply);<br>Use areas of poorer quality agricultural land in preference to that of higher quality, where significant development of agricultural land is demonstrated to be necessary (taking into consideration land which is classified as best and most versatile agricultural land, and its grade);<br>Take suitable opportunities to connect to and strengthen ecological networks that extend beyond the site, drawing on the measures proposed by | Considering each of the policy criteria in turn:<br>A: Consider the environmental qualities of land proposed for development<br>In accordance with national policy requirements, the Project has been designed following the mitigation hierarchy. At the routeing and siting stage, the Project design process was informed by the Holford and Horlock Rules to avoid impacts where possible. These established guidelines informed the evaluation criteria and how the mitigation hierarchy was applied during the options selection process. The adopted design approach is set out within **ES Chapter 3: Alternatives [APP-127]** which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the application for development consent. Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features as far as reasonably practicable. The Project |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | Local Nature Recovery Strategies, National Forest Strategies and Community Forest Plans, where present, and other relevant assessments;<br>Conserve and enhance existing natural features of visual, historic or nature conservation value (such as established trees and hedgerows) wherever possible; and use appropriate landscaping to help create a well-designed place and integrate the development into its surroundings;<br>Use green infrastructure provided as part of the scheme and nature-based solutions to secure multiple benefits: such as for biodiversity; surface water and pollution management (including maintaining flow rates and water quality); climate change mitigation and adaptation, and recreation;<br>Minimise impacts on biodiversity and include features for species which support priority or threatened species such as swifts, bats and hedgehogs. Development proposals should incorporate integrated nest boxes (commonly known as swift bricks) into their construction unless there are compelling technical reasons which prevent their use, or would make them ineffective; and<br>Make sure that green infrastructure and other features to support nature are located and designed to minimise risk of future failure, and that appropriate measures are in place for any necessary long-term management.<br>If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), | has considered sensitive areas and design minimisation of impacts.<br>Undergrounding is proposed in four locations, including through the Dedham Vale National Landscape and part of its setting. The Dedham Vale National Landscape is a nationally important and designated landscape. With the proposed underground cable, the effects on views and setting will be reduced.<br>B: Use areas of poorer quality agricultural land….<br>As reported in **ES Chapter 6: Agriculture and Soils [APP-138]** the potential presence of BMV land has been assessed through reference to published information and surveys of the areas permanently affected. The assessment sets out the total area of each land grade permanently affected and estimates the likely area of land at each grade. Measures have been outlined in the **Outline CoCP [APP-300]** and **Appendix C: Outline Soil Resource Plan of the Outline CoCP [APP-303]** to reduce the potential negative impacts on soils which are handled and disturbed, such as those to protect the quality of soils when they are disruption to agricultural activities. During construction there would be a loss of BMV land (ALC Grades 1, 2 and 3a) from agricultural productivity. It is calculated that 3461 ha of agricultural land would be temporarily removed from agricultural production during construction. Of this, 2923 ha (84.4%) are mapped as Grades 1, 2 and 3a and as such the temporary removal is considered to have a temporary negative effect which would be significant. During operation (and maintenance), there would be a permanent loss of areas of agricultural land required for permanent infrastructure. The assessment reported **ES Chapter 6: Agriculture and Soils [APP-138]** states this this permanent loss equates to approximately 172.7 hectares of Grade 1, Grade 2 and Grade |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | adequately mitigated or, as a last resort, compensated for, then the development should be refused. | 3a agricultural land (i.e., BMV land) would be taken out of agricultural production permanently. The Project minimises impacts on BMV agricultural land as far as practicable and includes mitigation measures to reduce impacts on the soil resource. The permanent loss of BMV land is considered necessary on the basis that there is urgent need for CNP Infrastructure such as the Project. The routeing and siting selection process confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Project.<br>C. Take suitable opportunities to connect to and strengthen ecological networks that extend beyond the site…<br>The Project has committed to deliver at least 10% BNG. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the **Biodiversity Net Gain Report [APP-299].** There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required. Within the Order Limits six areas of land (defined as Environmental Areas) are proposed around the Project's permanent assets, where there is sufficient space. To ensure the BNG target is reached, any additional creation / enhancement would be delivered outside of the Order Limits.<br>D. Conserve and enhance existing natural features of visual, historic or nature conservation value…<br>National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain. The Project would deliver an overall net improvement in |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | | environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation with environmental and societal benefits. This is reported in the **Biodiversity Net Gain Report [APP-299]**. There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required. On-site planting will be delivered through planting around the new Tilbury North Substation and around the existing Norwich Main Substation within the Environmental Areas, as identified in the O**utline Landscape and Ecological Management Plan (LEMP) [AS-046]**) as secured by **Requirement 9 in Schedule 3 of the DCO [APP-056]** sets out the landscape strategy.<br>E: Use of Green Infrastructure….<br>The **Outline Landscape and Ecological Management Plan (LEMP) [AS-046]**) as secured by **Requirement 9 in Schedule 3 of the DCO [APP-056]** sets out the landscape strategy.<br>F. Minimise impacts on biodiversity and include features for species which support priority or threatened species….<br>**ES Chapter 8: Ecology and Biodiversity [AS-026]** details the likely significant effects of the Project with respect to biodiversity, including: internationally, nationally and locally designated sites; protected species and habitats; and other species identified as being of principal importance for the conservation of biodiversity. The chapter concludes that no residual significant adverse effects are predicted as a result of the construction and operation of the Project. Commitment B01 of the **Outline CoCP [APP-300]** states that The Main Works Contractor(s) will comply with relevant protected species legislation. The commitments in the Outline CoCP will be secured by Requirement 4 in the **Draft DCO [APP-056].** Appropriate licences will be obtained where necessary from |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | | Natural England for all works affecting protected species as identified in the ES and through pre-construction surveys, these include project wide licenses for; bats, dormouse, otter, badgers and water vole. All applicable works will be undertaken in accordance with the relevant requirements and conditions set out in those licences. Where certain biodiversity receptors have been identified or where there is potential for them, and effects cannot be avoided during construction, Reasonable Avoidance Measures and/or Precautionary Working Methods may also be developed and implemented under supervision by an ECoW. National Grid intend to obtain a Letter of No Impediment (LONI) from Natural England for the draft protected species licenses. A Great Crested Newt District License will also be obtained from Natural Grid. Where certain biodiversity receptors have been identified or where there is potential for them, and effects cannot be avoided during construction, Reasonable Avoidance Measures and/or Precautionary Working Methods may also be developed and implemented under supervision by an ECoW as outlined within the Outline LEMP.<br><br>G. Make sure that green infrastructure and other features to support nature are located and designed to minimise risk of future failure, and that appropriate measures are in place for any necessary long-term management.<br><br>The Environmental Areas are located on land to be acquired by National Grid and any habitats included within the BNG onsite mitigation will be monitored and managed by National Grid for 30 years in line with commitments made within the **BNG Report [APP-299].**<br><br>Part 2: If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | | or, as a last resort, compensated for, then the development should be refused.<br>**ES Chapter 8: Ecology and Biodiversity [AS-026]** details the likely significant effects of the Project with respect to biodiversity, including: internationally, nationally and locally designated sites; protected species and habitats; and other species identified as being of principal importance for the conservation of biodiversity. The chapter concludes that no residual significant adverse effects are predicted as a result of the construction and operation of the Project. |
| N3: Trees in new development | In recognition of the benefits which trees can provide for biodiversity, climate change mitigation and adaptation, and the character and quality of the built environment, development proposals should:<br>Make new streets tree-lined (unless there are strong reasons why this would be inappropriate in specific streets), and incorporate trees in other suitable locations, such as in parks and through the provision of community orchards;<br>Make sure that the selection of species and their placement is compatible with highways and other infrastructure requirements and the needs of different users of public spaces; and will be effective in helping to adapt to the effects of climate change and delivering other environmental benefits. Suitable arboricultural advice should be sought, and proposals discussed with highways and trees officers where necessary, so that the right trees are planted in the right places; and | **ES Chapter 8: Ecology and Biodiversity [AS-026]** considers the potential effects of the Project on biodiversity. The receptors include woodland areas.<br>**ES Appendix 13.6 Arboricultural Impact Assessment [APP-236]** identifies trees which may be affected by the Project, and to provide information on their locations, quantity, and quality. The information on tree constraints informed the design development process and subsequent landscape and ecological management planning.<br>**ES Appendix 8.1: Habitat Report [AS-028]** sets out baseline information on ancient woodland, veteran and ancient trees within and adjacent to the Order Limits.<br>As a general principle, all land which is temporarily impacted by the Project will be reinstated where practicable to its pre-construction condition land use. The only exception to this will be restrictions on tree planting below the overhead line and directly on top of the underground cables. Species mixes will allow for low growing and shallow rooted tree/scrub species as an alternative in these locations. The **Outline LEMP [AS-046]** outlines the general principles for landscape and ecological reinstatement on the Project. |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | Make provision for the long-term maintenance of both existing and newly-planted trees which form part of the development. | Mitigation for the permanent loss of habitat would be delivered through the creation / enhancement of habitat associated with BNG for the Project. Within the Order Limits six areas of land (defined as Environmental Areas) are proposed around the Project's permanent assets, where there is sufficient space. To ensure the BNG target is reached, any additional creation / enhancement would be delivered outside of the Order Limits., An indicative landscape design has been created for these areas (**Appendix D: Outline Landscape Proposals of the Outline LEMP [APP-325]**). The habitats to be created and/or enhanced in these areas (onsite mitigation) have been designed to provide landscape and visual mitigation while also offering ecological value. |
| N4: Protected Landscapes | Development proposals within Protected Landscapes should be limited in scale and extent and sensitively located and designed to avoid harm to their statutory purposes and special qualities. Substantial weight should be placed on the importance of conserving and enhancing the natural beauty of these areas, and to conserving and enhancing wildlife and cultural heritage in National Parks and the Broads.<br>Proposals for major development within protected landscapes should only be supported in exceptional circumstances where it can be demonstrated that the development is in the public interest. To inform a decision about whether exceptional circumstances exist, consideration of such proposals should include an assessment of:<br>The need for the development, including in terms of any national considerations such as maintaining a | The Project has been designed following the mitigation hierarchy and has avoided impacts where possible through the routeing and siting process. This includes the decision to underground through Dedham Vale National Landscape and adjacent landscapes. A CSE compound would be located to the east of Raydon Great Wood, approximately 2 km to the north-east of the National Landscape at its closest point. The Project would then transition back to overhead line, heading north away from the National Landscape. To the south-east of Dedham Vale National Landscape, the underground cable route would continue outside the National Landscape and terminate at a new substation.<br>A further section of undergrounding is also proposed within the setting of the Dedham Vale National Landscape for approximately 3.9km.<br>**ES Appendix 13.5: National Landscape Assessment Study [APP-235]** considers the natural beauty, character and special qualities of Dedham Vale National Landscape. The National Landscape Assessment Study also sets out an assessment of |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | sufficient supply of minerals, and the impact of permitting it, or refusing it, upon the local economy;<br>The cost of, and scope for, developing outside the designated area, or meeting the need for the development in some other way; and<br>Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which it could be moderated.<br>Where, exceptionally, proposals for major development are approved within protected landscapes, steps should be taken to mitigate potential adverse impacts on their special qualities and statutory purposes, including on features such as tranquillity and dark skies.<br>Development proposals within the setting of protected landscapes should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas. | the impacts of the Project on the special qualities of the National Landscape and how this may impact on the National Landscape's ability to deliver its statutory purpose to conserve and enhance natural beauty. The assessment concludes that there would be significant adverse effects during construction. The assessment of effects during operation (and maintenance) concludes that minor and not significant (adverse) effects would be experienced once the underground cable has been installed and the underground corridor reinstated.<br>The need for the development is set out in the **Planning Statement [APP-085]**: the Project is Critical National Priority Infrastructure. The NPS EN-1 Paragraph 4.2.16 sets out that where a project is CNP Infrastructure the Secretary of State will take as a starting point for decision making that that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.<br>The Project notes the consultation draft NPPF no longer includes a reference to 'Valued Landscapes' (previously paragraph 187 of the NPPF). It is considered that this deletion provides clarity and would reinforce the primary of statutory and formally designated landscapes, avoiding the potential for a blurring of the hierarchy of protection. The deletion would also bring the NPPF into alignment with NPS EN-1 and EN-5 (which focus on impact, mitigation and overall planning balance). |
| N6: Areas of particular importance for biodiversity | To support the conservation of important habitats, development proposals affecting:<br>A site of international importance, which for the purpose of this policy is a habitats site, should be refused unless: | **ES Chapter 8: Ecology and Biodiversity [AS-026]** present the assessment of the likely significant ecology and biodiversity effects that could result from the Project. The chapter concludes that no residual significant adverse effects are |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | an appropriate assessment has concluded that the proposal will not adversely affect the integrity of the site (either individually or in combination with other developments), or that there are imperative reasons of overriding public importance; and/or<br>the impact of development on the relevant protected feature of the protected site is being addressed through an Environmental Delivery Plan which has been made and the developer has committed to paying the nature restoration levy.<br>A site of national importance, which for the purpose of this policy is one designated as a Site of Special Scientific Interest, should only be supported if:<br>there would be no adverse effect (either individually or in combination with other developments) on the features of special scientific interest of the SSSI; or<br>the benefits of the development in the location proposed clearly outweigh both the likely impact on the features of special scientific interest, and any broader impact on the national network of Sites of Special Scientific Interest; or<br>the impact of development on the relevant protected feature of the protected site is being addressed through an Environmental Delivery Plan which has been made and the developer has committed to paying the nature restoration levy.<br>A site of local importance, which for the purpose of this policy is one designated as a Local Nature Reserve or identified as a local wildlife site, local geological site or equivalent in the development plan, should only be supported if: | predicted as a result of the construction and operation of the Project.<br>Through careful routeing and siting the Project avoids and / or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, during the construction and operation (including maintenance) phases<br>A **Habitats Regulations Assessment Report (APP-082]** has been prepared. The Project does not result in any HRA or MCZ residual impacts.<br>**Chapter 7 of the Outline LEMP [AS-046]** sets out specific measures and commitments in relation to ancient woodland and veteran trees.<br>Mitigation for the permanent loss of habitat would be delivered through the creation / enhancement of habitat associated with BNG for the Project. Within the Order Limits six areas of land (defined as Environmental Areas) are proposed around the Project's permanent assets, where there is sufficient space. To ensure the BNG target is reached, any additional creation / enhancement would be delivered outside of the Order Limits.<br>Ancient Woodland<br>The Project has been designed in a way which prioritises the retention and conservation of significant trees. Owing to the size of the Project it has not been possible to completely avoid the loss of such natural features therefore an **Ancient Woodland and Veteran Tree Strategy (Appendix B to the Outline LEMP [APP-323]**) has been prepared to support the application for development consent. The **Veteran Tree Strategy (Appendix B to the Outline LEMP [APP-323]**) notes that 51 blocks of ancient woodlands fall within 200 m of the Order Limits, of which 1.7 ha is falls within the Order Limits. All |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | there would not be a significant adverse effect on the integrity of the site; or<br>the benefits of development in the location proposed clearly outweigh the likely impact on the features which make the site valuable for nature conservation.<br>Irrespective of a site's status in nature conservation terms, development proposals which would entail the loss or deterioration of irreplaceable habitats (such as ancient woodlands and ancient and veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists | ancient woodland is set out within Table A8.1.6 of ES Appendix 8.1: Habitat Report and presented in **ES Figure A8.1.3: Ancient Woodland Locations [both within AS-028]**.<br>Potential impacts (excavation and non-excavation), in the absence of mitigation, were identified at 10 ancient woodland parcels (five within ancient woodlands themselves and five within the 15 m buffer root protection zone (RPZ)). Project commitments to standard mitigation measures have completely removed potential impacts to five of these ancient woodland and reduced impacts to a further one ancient woodland. All remaining potential impacts (Round Wood, Rivenhall Thicks, Writtle-Writtlepark Wood, Little Bladen's Wood and Clapgate Wood) are unavoidable as proposed works relate to third-party preexisting assets within the woodlands required to facilitate the Project. Additional mitigation measures have been proposed for these five sites (the above-mentioned ancient woodland parcels), to ensure no significant long term residual effects on ancient woodland are encountered as a result of the Project.<br>Where it is not possible to completely avoid impacts, the Project seeks to minimise impacts through design changes or modifications to working methodology. Standard mitigation measures, comprising management activities and techniques, would be implemented during construction of the Project to limit effects through adherence to good site practices and achieving legal compliance. The **Outline CoCP [APP-300]** contains relevant standard / good practice mitigation measures relating specifically to landscape, ecology and biodiversity along with commitments made by National Grid. As stated in the **Outline CoCP [APP-300]** the Project has committed to there being no physical works or breaking ground within 15 m of ancient woodland where at all practicable. Demarcation |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | | measures will be used to ensure this 15 m buffer is not breached. These embedded and standard mitigation measures are set out in the **Outline LEMP [AS-046]** and the **Ancient Woodland and Veteran Tree Strategy (Appendix B to the Outline LEMP [APP-323])**. In addition, the implementation of the Outline Dust Management Plan set out within the **Outline CoCP [APP-304]** would ensure no negative effects on ancient woodland because of dust. In most cases, the above avoidance, embedded and standard mitigation measures are adequate to avoid impacts on to ancient woodland. However, where this is not the case, additional mitigation, comprising measures over and above any embedded and standard mitigation measures, are proposed to further reduce avoid significant environmental effects.<br>As set out in the **Outline CoCP [APP-300]** where sensitive features are to be retained (i.e., veteran, and mature trees, and Ancient Woodland), an appropriate protective area or protection mechanisms will be established using appropriate equipment or fencing and signage and will be inspected, repaired, and replaced as necessary.<br>*Veteran Trees*<br>The **Arboricultural Impact Assessment [APP-236]** concludes that a total of 112 trees and four groups have been surveyed within the Project Study Area as veterans. Four individual veteran trees require removal, while 15 veteran trees and two veteran groups require crown management. A full record of the identified veteran trees is included in Table 7.3 of the **Outline LEMP [AS-046]**. Appendix B: Veteran Tree and Ancient Woodland and Veteran Tree Strategy Mitigation Strategy of the **Outline LEMP [APP-323]** details the management outcomes and compensation strategy for veteran trees. Veteran trees are acknowledged as being irreplaceable, |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | | therefore full compensation is unachievable. Compensation Planting will include a combination of new planting, sapling relocation, seed bank for local provenance, and financial contributions to local tree planting organisations to plant and maintain new areas of planting off-site.<br>Veteran trees to be removed will still provide essential habitats for the local flora and fauna. Where practical, after being felled, each tree should be laid as close to their original location as possible or near existing woodland to provide a deadwood habitat area. The material to be left should be as intact as is practicable.<br>The project notes the proposed change to the description of veteran trees presented in the NPPF Glossary from A tree which, because of its age, size **and** condition, is of exceptional biodiversity, cultural or heritage value to tree which, because of its age, size **or** condition, is of exceptional biodiversity, cultural or heritage value.<br>**6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]** considered trees using a known method of categorisation that conformed to the NPPF version available during the period of surveying and reporting. The draft NPPF still contains reference to 'exceptional' and refers to 'irreplaceable habitat' for both ancient woodland and veteran trees. Where there is impact the draft NPPF continues to recognise that wholly exceptional reasons and a suitable compensation strategy can exist. |
| **Section 20** | **Conserving and enhancing the historic environment- National decision-making policies** | |
| HE4: Securing the conservation and | Heritage assets, as an irreplaceable resource, should be conserved and enhanced in a manner appropriate to their significance. To achieve this, development proposals which would affect the | **ES Chapter 11: Historic Environment [AS-068]** presents the assessment of the Project on heritage assets. This has been supplemented by field evaluation, including geophysical survey and trial trenching. Details of these can be found in **ES** |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| enhancement of heritage assets | significance of heritage assets, including any contribution made by their setting should:<br>Maintain or secure a use consistent with their conservation, taking into account the importance of maintaining the assets, the positive contribution they can make to sustainable communities including local economies, and the positive contribution they can make to local character and distinctiveness;<br>Avoid harm to the significance of heritage assets, and instead preserve and enhance this significance.<br>If harm to the significance of heritage assets cannot be minimised or avoided, there should be a clear and convincing justification in accordance with the policies in this chapter.<br>Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the asset should not be taken into account in any decision relating to the asset.<br>Proposals for enabling development, which would otherwise conflict with other policies in this Framework but which would secure the future conservation of a heritage asset, should be considered on the basis of whether the conservation benefits outweigh the disbenefits of departing from the policies concerned.. | **Chapter 11: Historic Environment [AS-068], ES Appendix 11.4: Geophysical Survey Results Report [AS-072 – AS-077] and ES Appendix 11.5: Trial Trenching Results Report [AS-078]**.<br>The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on cultural heritage and archaeology assets. However, due to the statutory tests outlined in the Infrastructure Planning (Decisions) Regulations 2010 (H. M. Government, 2010), the SoS, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty. The Assessment of Harm to Designated Assets presented in **Assessment of Harm to Designated Heritage Assets [APP-215]**. demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the consultation draft NPPF no longer includes the term 'less than substantial harm' this phrasing should be considered to refer to the 'harm' category in the consultation draft version. The change in terminology does not affect the conclusions presented in **Assessment of Harm to Designated Heritage Assets [APP-215]**.<br>The archaeological evaluation work (geophysics and trial trenching) has continued since the submission of the application for development consent, continuing the Applicant's commitment to the historic environment potentially affected by the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as **Supplementary Environmental Information [AS-068 to AS-083]** to which the council are aware of. This information included further priority geophysical survey and trial trenching results, and preliminary results of part of the Phase 2 |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
|---|---|---|
| | | geophysical survey. The Phase 2 stage of the geophysical survey and trial trenching will continue throughout 2026, and all the results of this work will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed at monthly meetings and set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**. The vast majority of the priority geophysical survey and trial trenching are complete and inform the forthcoming Supplementary Environmental Information.<br><br>The Project proposes to update **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** during the examination period in consultation with the Local Planning Authority Archaeological Advisors. The update and scope of the document will be informed by the findings of the ongoing fieldwork and the document will identify areas of Phase 2 evaluation and areas where mitigation will be required. However, the fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed, and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State. The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** already includes provision for further evaluation and a range of mitigation strategies, including preservation in situ should highly significant remains be identified.<br><br>Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this loss of significance |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| | | is necessary and justified to achieve the substantial public benefit of delivering the Project. |
| HE5: Assessing effects on heritage assets | Development proposals affecting heritage assets should be accompanied by an assessment of the significance of the assets affected (including any contribution made by their setting) and of the potential effect of the proposal on their significance. The level of detail should be proportionate to the assets' importance and no more than is necessary to understand the potential effect of the proposal on their significance. The relevant historic environment record should be consulted as a minimum, and appropriate expertise employed where necessary.<br>Assessments of the potential effects of development proposals on heritage assets and their setting should identify whether proposals would be likely to:<br>Have a positive effect, which is where a heritage asset would be enhanced, or its significance better revealed; or<br>Have no effect on the significance of the asset; or<br>Result in harm to the significance of the heritage asset, either from work affecting the asset itself or from development within its setting. The degree of harm should be identified: substantial harm would occur where the development proposal would seriously affect a key element of the asset's significance; or<br>Cause the total loss of the significance of the heritage asset. | In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse residual effects on cultural heritage and archaeological assets. **ES Chapter 11: Historic Environment [AS-068]** concludes that the Project would not result in substantial harm to any designated historic assets.<br>The ES Chapter is supported by the following appendices:<br>• **Appendix 11.1 Historic Environment Baseline Report [APP-209]**<br>• **Appendix 11.2 Historic Environment Assessment Tables [AS-070]**<br>• **Appendix 11.3 EACN Substation Geophysical Survey Report [APP-211]**<br>• **Appendix 11.4 Geophysical Survey Results Report (AS-072 – AS-077)**<br>• **Appendix 11.5 Trial Trenching Results Report [AS-078]**<br>• **Appendix 11.6 Geoarchaeological and Archaeological Monitoring of Ground Investigation Works Report [APP-214]**<br>• **Appendix 11.7 Assessment of Harm to Designated Heritage Assets [APP-215]**<br>National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse residual effects on cultural |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| | In making this assessment it is the effect on an asset's significance rather than the scale of the development which should be considered.<br>Decision makers should be satisfied that this assessment accurately reflects the effects on heritage assets caused by the proposals.<br>Where a development proposal involves, or has the potential to involve, heritage assets with archaeological interest, an appropriate desk-based assessment should be employed and, where necessary, a field evaluation. | heritage and archaeological assets. Mitigation measures to reduce impacts on archaeology are set out in the Outline Archaeological Mitigation Strategy and **Outline Written Scheme of Investigation (AMS-OWSI) [APP-328]** which includes preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction.<br>**ES Appendix 11.7 [APP-215]** concludes that none of the harm is of so considerable a scale as to be classified as substantial harm. It is considered that the lower less than substantial harm and mid less than substantial harm reported in **Appendix 11.7 [APP-215]** does equate to a loss of significance to heritage assets. This loss of significance should be considered against the wider public benefit associated with the delivery of this Project.<br>The less than substantial harm upon non designated heritage assets affected by the Project is also clearly outweighed by the substantial public benefits and need for the Project. |
| HE6: Proposals affecting designated heritage assets | When considering the potential effect of a development proposal on a designated heritage asset, substantial weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm, or total loss of its significance.<br>Development proposals which would have a positive effect on designated heritage assets should be approved.<br>Where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be | **ES Chapter 11: Historic Environment [AS-068]** concludes that the Project would not result in substantial harm to any designated historic assets.<br>Utilising the terminology contained in NPS EN-1 it is considered that the lower less than substantial harm and mid less than substantial harm reported in **Appendix 11.7 [APP-215]** does equate to a loss of significance to heritage assets. The substantial public benefits and need for the Project contributes towards meeting national energy security objectives, clearly and demonstrably outweigh the less than substantial harm, at the medium and lower end of the spectrum, to the designated heritage assets.<br>The potential for harm or loss of significance upon non-designated heritage assets affected by the Project is also |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| | weighed against any public benefits resulting from the proposal. Important public benefits can include securing the long-term re-use of a vacant or underused listed building, and enabling energy efficiency and low carbon heating measures to be employed.<br>Where a development proposal would cause substantial harm to, or the total loss of, the significance of a designated heritage asset, consent should be refused unless it can be demonstrated that the development is necessary to achieve substantial public benefits that outweigh the harm or loss, or if all of the following apply:<br>The nature of the heritage asset would otherwise prevent all reasonable uses of the site; and<br>No suitable use for the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and<br>Conservation by grant-funding or some form of not for profit, charitable or public ownership is not possible; and<br>The harm or loss is outweighed by the benefit of bringing the asset back into use.<br>Within this context, development which would cause substantial harm to, or the total loss of, the significance of grade II listed buildings, or grade II registered parks or gardens, should be exceptional; while development which would cause substantial harm to, or the total loss of, assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered | clearly outweighed by the substantial public benefits and need for the Project providing the judgement required under NPS EN-1. |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| | parks and gardens, and World Heritage Sites, should be wholly exceptional. | |
| HE7: Decisions on non-designated heritage assets | Development proposals which would have a positive effect on non-designated heritage assets should be approved.<br>Where a development proposal would cause harm to, or the total loss of, the significance of a non-designated heritage asset, it should only be supported where the harm or loss is outweighed by the benefits of the proposal, having regard to the scale of the harm or loss and the significance of the non-designated heritage asset.. | The less than substantial harm upon non-designated heritage assets affected by the Project is clearly outweighed by the substantial public benefits and need for the Project. |
| HE8: World Heritage Sites | To secure the long-term future of World Heritage Sites and support the preservation and enhancement of their significance and Outstanding Universal Value, development proposals that affect a World Heritage Site should:<br>Be designed in a way which pays particular regard to the significance and attributes of the Outstanding Universal Value of the World Heritage Site (including any contribution made by its setting and any buffer zone);<br>Take into consideration any relevant implications of the World Heritage Site management plan; and<br>Be supported by an assessment of the impact, including any potential cumulative impact, on the significance and Outstanding Universal Value of the World Heritage Site. This should include appropriate information such as visual impact assessments and natural environment, archaeological or historical data. | Noted. The Project does not propose any new development in Conservation Areas or World Heritage Sites. **Appendix 11.1: Historic Environment Baseline Report [APP-209]** provides a detailed overview of the heritage assets, including Conservation Areas which are within the defined Study Area |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| | Not all elements of a World Heritage Site will necessarily contribute to its significance or Outstanding Universal Value. Where a development proposal would result in the loss of a building or other element which contributes to the significance or Outstanding Universal Value of a World Heritage Site, the assessment of impact should take into account the relative significance and Outstanding Universal Value of the element affected and its contribution to the significance of the World Heritage Site as a whole, and the effects of this considered in accordance with policies HE5 and HE6.<br>Proposals that preserve those elements of the setting of a World Heritage Site that make a positive contribution to it (or which better reveal its significance) should be approved. | |
| HE9: Conservation areas | Development proposals within or affecting the significance of conservation areas should:<br>Retain and restore buildings and other features which make a positive contribution to the character or appearance of a conservation area wherever possible; and<br>Consider the area's special architectural or historic interest (as identified as part of the designation of the conservation area) in the design of development.<br>Not all elements of a conservation area will necessarily contribute to its significance. Where a development proposal would result in the loss of a building or other element which contributes to the character or appearance of a conservation area that | **ES Chapter 11: Historic Environment [AS-068]** presents the assessment of the likely significant cultural heritage effects that could result from the Project. Through sensitive routeing and siting National Grid has sought to avoid and reduce, as far as possible, adverse effects on identified heritage assets. National Grid is proposing to utilise low height pylons for the section of overhead line that passes between Great Waltham conservation area/ Langleys registered park and garden and Little Waltham Conservation Area, to reduce visibility of the alignment from Langleys House and more distant elements of the conservation areas and park and garden. The Project has been designed to avoid and reduce impacts to heritage assets. |

| Paragraph / Section No. | Policy Requirement | How the Project Accords with the Policy |
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| | is desirable to preserve or enhance, the assessment of impact should take into account the relative significance of the element affected and its contribution to the significance of the conservation area as a whole, and the effects of this considered in accordance with policies HE5 and HE6.<br>Proposals that preserve those elements of a conservation area that make a positive contribution to it (or which better reveal its significance) should be approved. | |
| HE10: Archaeological assets | Where a development proposal has the reasonable potential, based on evidence, to affect an archaeological heritage asset, discovered or undiscovered, an appropriate investigation of the asset's significance and the potential effect on this should be undertaken to identify the design of the development proposal, mitigation and implementation of the development.<br>Archaeological assets should be preserved in situ wherever feasible. Where the archaeological asset cannot be preserved or managed on-site, appropriate provision should be made for the investigation, understanding, recording, dissemination and archiving of that asset, and should be undertaken by suitably-qualified individuals or organisations. | The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets through the process of design development, and by embedding measures into the design of the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. **ES Chapter 11: Historic Environment [AS-068]** reports the assessment of the likely significant cultural heritage effects that could result from the Project.<br>Mitigation measures to reduce impacts on archaeology are set out in the **Archaeological Mitigation Strategy and Outline WSI [APP-328]** and includes preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction. |

## 1.6 Signposting for how the Project has had regard to Local Planning Policy (Plans Adopted since 1 April 2025 and those emerging plans)

Table 1.12 Signposting of policy wording of relevant local plan policy

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| **Norfolk County Council Minerals and Waste Local Plan 2023-2038 (adopted May 2025)** | | |
| **Policy MP1**<br>**Provision for minerals extraction** | The strategy for minerals extraction is to allocate sufficient sites to meet the forecast need for both sand & gravel and hard rock (carstone). For sand and gravel, specific sites to deliver at least 6.91 million tonnes of resources will be allocated. The sand and gravel landbank will be maintained at a level of at least 7 years' supply (excluding any contribution from borrow pits for major construction projects). Mineral extraction for sand and gravel outside of allocated sites will be supported by the Mineral Planning Authority where the proposal is consistent with all other relevant policies set out in the Development Plan and the applicant can demonstrate one or more of the following: There is an overriding justification and/or overriding benefit for the proposed extraction; and/or the landbank of permitted reserves of sand and gravel in Norfolk is below seven years. There is not a forecast shortfall in permitted reserves for Carstone during the Plan period. However, a site for carstone will be allocated to provide flexibility to meet any future increase in demand for carstone. The landbank for carstone will be maintained at a level of at least 10 years' supply. For silica sand, sufficient sites to deliver at least 8.98 million tonnes of silica sand resources will be required during the Plan period. The landbank for | The Project would have no direct interaction with any mineral allocations identified in the Norfolk County Council Minerals and Waste Local Plan 2023-2038 (adopted May 2025). The Order Limits do not interfere with the Stoke Holy Cross/Swardeston Sand and Gravel site to the north of the Norwich Main Substation. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | silica sand will be maintained at a level of at least 10 years' supply where practicable. Planning applications for silica sand extraction located outside of allocated sites, which would address the shortfall in permitted reserves, will be determined on their own merits in accordance with the policies in this Local Plan, including the requirements contained within Policy MPSS1. | |
| **Policy MP11 – Mineral Safeguarding Areas and Mineral Consultation Areas** | "The County Council will safeguard existing, permitted and allocated mineral extraction sites from inappropriate development proposals. Mineral Consultation Areas are delineated on the Policies Map and extend to 250 metres from each safeguarded site. Development proposals within 250 metres of a safeguarded site should demonstrate that they would not prevent or prejudice the use of the safeguarded site for mineral extraction and the 'agent of change' principle will be applied in all such cases. The County Council will object to development proposals which would prevent or prejudice the use of safeguarded sites for mineral extraction.<br>The County Council will safeguard Norfolk's silica sand, carstone, and sand and gravel mineral resources, within the Mineral Safeguarding Areas identified on the Policies Map, from inappropriate development proposals. For mineral resources the Mineral Consultation Area is the same defined area as the Mineral Safeguarding Area.<br>The Mineral Planning Authority should be consulted on all development proposals within Mineral | This Policy replaced Policy CS16 from the Norfolk County Council Core Strategy and Minerals and Waste Development Management Policies Development Plan Document (2011).<br>The Project has sought to avoid direct interactions with existing minerals sites, where possible, as described within **ES Appendix 9.2: Qualitative Minerals Resource and Infrastructure Assessment [APP-183].**<br>Further details can be found in **ES Chapter 9: Contaminated Land, Geology and Hydrogeology [APP-181].** The ES chapter concludes that discussions with the existing minerals operators are ongoing and where appropriate, subject to Statements of Common Ground to agree appropriate mitigation for any potential impacts on these sites. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | Consultation Areas, except for the excluded development types set out in Appendix 4.<br>For relevant development proposals located within a Mineral Safeguarding Area the Mineral Planning Authority will expect to see appropriate investigations carried out to assess whether any mineral resource there is of economic value, and if so, whether the mineral could be economically extracted prior to the development taking place. This information should be provided through the submission of a Mineral Resource Assessment, as set out in Appendix 10.<br>The conservation benefits of carstone will be a consideration in safeguarding resources.<br>In line with the NPPF, the Mineral Planning Authority will object to development which would lead to the sterilisation of the mineral resource, and it would be for the relevant Local Planning Authority to decide whether there are compelling planning reasons for over-riding this safeguarding objection." | |
| **Essex County Council Emerging Replacement Essex Minerals Local Plan Review 2025 to 2040 – Draft Local Plan (Regulation February 2024)** | | |
| **Policy S8 – Safeguarding Mineral Resources** | Safeguarded mineral resources of national and local importance (sand and gravel, silica sand and brick-making clay) are shown on the Policies Map as 'Mineral Safeguarding Areas'. These resources are safeguarded against unnecessary sterilisation.<br>Unless defined as 'excluded development', proposed non-mineral development that exceeds the relevant thresholds shall be supported by a Mineral ResourceAssessment demonstrating whether prior extraction is practical and environmentally feasible. | This Policy replaced Policy S8 from the Essex County Council Minerals and Waste Local Plan (2014).<br>The Project has sought to avoid direct interactions with existing minerals sites, where possible, as described within **ES Appendix 9.2: Qualitative Minerals Resource and Infrastructure Assessment [APP-183].**<br>The Regulation 18 Draft Local Plan does not include a list of Preferred Sites for allocation. A list of potential allocations (Candidate Sites Assessments) |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | Proposed non-mineral development within Mineral Safeguarding Areas, shall, subject to other policies of the development plan, be permitted where:<br>a) prior extraction of mineral forms part of the non-minerals development; or,<br>b) the sterilisation of a mineral resource will not occur; or,<br>c) prior extraction has been demonstrated as not being practical or environmentally feasible, now or in the future, and there are other benefits that outweigh the loss of part or all of the safeguarded mineral deposit. | were published with the consultation which set out a number of sites which, if allocated, would interact with the Order Limits and Study Area, including:<br>• A86 Martells, North of Frating Road – West<br>• A85 Martells, North of Frating Road – East<br>• A79 Crown Quarry, North of Wick Lane<br>• A47 Bradwell, Monk's Farm<br>• A59 Lowleys Farm<br>• A91 Land at Chignal St. James<br>The effects of the Project on candidate minerals infrastructure sites are considered in the **Environmental Statement Appendix 9.2 – Qualitative Minerals Resource and Infrastructure Assessment [APP-183].**<br>The operation (and maintenance) impacts on minerals are considered to be very small, based on the assessment presented within the MRIA. For safeguarded minerals resources (medium sensitivity), this would result in a negligible effect which is considered not significant. Essex County Council raised concerns (see **Draft Statement of Common Ground Essex County Council [APP-091]** in relation to sampling techniques used to support the Minerals Impact Assessment (MRA). The MRA should set out the extent that issues of mineral sterilisation have impacted on the final proposed route. The content of the MRA therefore remains under discussion.<br>The ES chapter concludes that discussions with the existing minerals operators are ongoing to agree |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | appropriate mitigation for any potential impacts on these sites. |
| **Policy S9 – Safeguarding Mineral Extraction Sites and other Mineral Infrastructure** | Mineral Infrastructure Consultation Areas (MICAs) are designated up to 250m from the site boundary of existing, permitted and allocated minerals infrastructure, including mineral extraction sites. MICAs are set out on the Minerals Local Plan Policy Map.<br>Non-minerals development within MICAs shall be supported by a Minerals Infrastructure Impact Assessment. Non-minerals development within MICAs shall only be permitted where:<br>a) suitable and effective mitigation would ensure that there would be no unacceptable impact on either the non-minerals development and/or the existing or proposed minerals infrastructure; or,<br>b) a temporary permission for the mineral infrastructure has expired or will expire by the time of the operation/occupation of the non-mineral development, and there is no potential for mineral use to recommence; or<br>c) the minerals infrastructure has otherwise ceased and there is no potential for the development to recommence, and the site is considered unsuitable for a subsequent minerals infrastructure or,<br>d) redevelopment of the minerals infrastructure site or loss of the minerals infrastructure would form part of a strategy or scheme that has wider environmental, social and/or economic benefits that outweigh the retention of the site or the | The Project has sought to avoid direct interactions with existing minerals sites, where possible, as described within **ES Appendix 9.2: Qualitative Minerals Resource and Infrastructure Assessment [APP-183]**. The policies map within the adopted Essex County Council Minerals Local Plan confirms that parts of the Order Limits for the Project are located within a MSA for sand and gravel and brickclay. The Study Area also interacts with some existing minerals sites and the associated Mineral Consultation Areas (MCAs), as shown on E**S Figure 9.3: Mineral Safeguarding Areas, Mineral Consultation Areas, and Minerals Infrastructure [APP-188]** as discussed in **ES Chapter 9: Contaminated Land, Geology and Hydrogeology [APP-181].**<br>**ES Chapter 9: Contaminated Land, Geology and Hydrogeology [APP-181]** concludes that temporary construction impacts on existing minerals infrastructure (very high sensitivity) would be very small. This would result in a minor effect which would be not significant. The operation (and maintenance) impacts on minerals are considered to be very small, based on the assessment presented within the MRIA. For safeguarded minerals resources (medium sensitivity), this would result in a negligible effect which is considered not significant. Essex County Council raised concerns (see **Draft Statement of Common Ground Essex County Council [APP-091]** in relation to sampling techniques used to |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | minerals infrastructure, and alternative provision is made for the displaced minerals infrastructure; or,<br>e) a suitable replacement site for the minerals infrastructure has otherwise been identified and permitted.<br>Where planning permission is granted for new mineral infrastructure, those sites will also be safeguarded so that the minerals infrastructure is not compromised by sensitive or inappropriate development that would conflict with their use. Minerals infrastructure will be safeguarded for the life of the planning permission or, where located in a mineral working, for the life of the planning permission of the primary mineral workings unless there are significant reasons for doing otherwise. | support the Minerals Impact Assessment (MRA). The MRA should set out the extent that issues of mineral sterilisation have impacted on the final proposed route. The content of the MRA therefore remains under discussion. The ES chapter concludes that discussions with the existing minerals operators are ongoing to agree appropriate mitigation for any potential impacts on these sites. |
| **Colchester City Council Preferred Options Local Plan Regulation 18 Consultation November 2025** | | |
| **Policy ST1: Health and Wellbeing** | The way places are planned, designed and built can have a significant influence over health and wellbeing. All development should be designed to provide opportunities for healthy lifestyles and contribute to the creation of healthier and inclusive communities and help to reduce health inequalities for people of all ages and abilities through placemaking. The Council will continue to work with partners and health providers to improve and promote healthier and active lifestyles for our residents and communities. Health and wellbeing outcomes are embedded throughout the policies in the Plan. To achieve healthy and inclusive communities, all new development should: | **ES Chapter 10: Health and Wellbeing [APP-192]** details the assessment of the potential residual effects of the Project on Health and Wellbeing. The assessment includes a series of embedded and standard mitigation measures considered as part of the integral environmental appraisal considered from the outset. Section 10.7 of ES Chapter 10 demonstrates that the likely significant effects of the Project can be mitigated through the proposed measures, such to comply with National, Regional and Local Policy. These measures have been informed through the engagement and consultation activities that have taken place with stakeholders, which has helped to provide for a well-informed |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | a) Promote healthy neighbourhood design, providing opportunities for healthy lifestyles for all by creating well-designed, safe and accessible places.<br>b) Provide healthy and affordable homes that meet the needs of the community.<br>c) Provide easy access to natural environments including green and blue infrastructure and open spaces.<br>d) Promote active and sustainable environments and encourage active travel.<br>e) Promote a healthy food environment.<br>f) Provide access for all to health facilities and services, a range of employment opportunities, and sport and recreation facilities.<br>g) Seek environmental improvements, minimising exposure to potential sources of environmental harm including pollutants and noise and improving air quality.<br>h) Minimise, manage and mitigate against the effects of climate change.<br>In addition, and where appropriate, new development should support the provision of healthcare infrastructure to accommodate needs, in accessible locations, in line with the requirements outlined in the Infrastructure Delivery Plan and set out in site allocation policies. A Health Impact Assessment will be required for all residential development in excess of 50 units or non-residential development in excess of 1,000sqm and hot food takeaways and fast food outlets in accordance with Policy PC1, in order to | approach that takes into account local demographics and health considerations<br>The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routing and siting of infrastructure and temporary works. **ES Chapter 7: Air Quality [APP-147]** assesses the likely air quality effects that would result from the Project and considers the existing baseline conditions and the likely changes and effects to air quality levels during the construction phase. As set out in the **Scoping Report (APP-288 to APP-296) and agreed within the Scoping Opinion [APP-297],** the operational phase of the Project will not result in any significant impacts to air quality and no further assessment has been carried out in the ES. AQMAs and Air Quality Action Plans prepared by the local planning authority have been taken into consideration as a part of the ES assessment. The assessment confirms that with the implementation of the proposed standard mitigation measures, the effects of construction on air quality in regard to dust soiling, and human health effects are anticipated to be not significant.<br>A cumulative assessment is provided in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. Paragraphs 17.5.46 to 17.5.48 contain the findings in relation to health and wellbeing of inter-project cumulative effects. For example, it is identified that in a number of instances, adverse effects on mental health and wellbeing may |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | demonstrate that the development would have an acceptable impact on health and wellbeing. The Council will require Health Impact Assessments to be prepared having regard to the most up to date advice and best practice for such assessments. The purpose of the Health Impact Assessment will be to identify the potential health consequences of a proposal. The assessment should include recommendations on how positive health benefits can be maximised and how negative impacts on health and inequalities can be avoided or mitigated. Where a development has a significant adverse impact on health and wellbeing, the Council will require applicants to provide for the mitigation of such impacts. Developments which will have an unacceptable significant adverse impact on health and wellbeing which cannot be mitigated, or that fail to offer reasonable provisions, will not be permitted. | 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.<br>A landscape strategy has been prepared for the Environmental Areas at the Great Horkesley CSE compounds within Colchester City Council which provides a collaborative approach to delivering landscape and biodiversity mitigation (O**utline Landscape and Ecological Management Plan [AS-046])** as secured by Schedule 3 of the **Draft DCO [APP-056].** This landscape strategy has been developed in recognition of the local landscape policies and landscape character, considering the opportunities for local landscape and biodiversity enhancements. It has been developed as part of the iterative process of design and assessment. |
| **Policy ST2: Environment and the Green Network and Waterways** | All proposals must conserve and enhance Colchester's natural and historic environment, including the protection and enhancement of sites of international, national, regional, and local importance. The Council will safeguard the landscape character of Colchester as defined by the area's existing biodiversity, geology, green network and waterways, history, and archaeology. The Council will support the use of Natural England's Environmental Benefits from Nature tool. Proposals must have regard to delivering the aims and objectives of the Essex Local Nature Recovery Strategy and Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) or any | The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. **ES Chapter 8: Ecology and Biodiversity [AS-026]** presents the assessment of the likely significant ecology and biodiversity effects that could result from the Project. The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | relevant successor documents. Proposals for habitat creation, enhancement and BNG should have regard to the Colchester City Strategic Biodiversity Assessment. Strategic areas that present the best opportunities for habitat creation and enhancement aimed at improving biodiversity are shown on the policies maps as 'strategic biodiversity areas'. These strategic biodiversity areas will be protected, and support will be given to strengthening and enhancing connections between habitats to improve their contribution to the biodiversity network. All major residential development proposals must have a Green Network and Waterways Plan (which could form part of the Design and Access Statement) setting out how the development meets the Council's Green Network and Waterways Guiding Principles. The Plan should include details of the timescale for the implementation of each aspect of the Plan within that phase of development and details of the quality standard of construction and maintenance. Open spaces should be incorporated into other strategies and plans for the site, such as surface water management strategies, landscape, utilities, and biodiversity net gain to coordinate delivery, management and maintenance. | habitats, and veteran trees, during the construction and operation (including maintenance) phases.<br>In addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the **Biodiversity Net Gain Report [APP-299]**. There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required.<br>**ES Chapter 11: Historic Environment [AS-068]** assesses the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. Mitigation measures to reduce impacts on archaeology are set out in the **Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (WSI) [APP-328]** and includes |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction |
| **Policy ST9: The Tendring Colchester Borders Garden Community** | Land identified in the Tendring Colchester Borders Garden Community Development Plan Document and shown on the Policies Map is allocated for the development of the Tendring Colchester Borders Garden Community. The Development Plan Document (DPD) (adoption anticipated Spring 2025) allocates and protects land for the following uses:<br>a) delivery of circa 7,500 new homes with a range of shops, jobs, services and community facilities, including education and early years and childcare;<br>b) a new 'Salary Brook Country Park' incorporating land and woodland at and around the Salary Brook Local Nature Reserve in Colchester;<br>c) a 'Wivenhoe Strategic Green Gap' incorporating land north of Brightlingsea Road and west of Elmstead Road;<br>d) an 'Elmstead Strategic Green Gap' east of the new A120-A133 Link Road;<br>e) a Sports and Leisure Park to serve the local community and for the expansion of sports facilities for the University of Essex;<br>f) approximately 25 Hectares of employment land in the form of a new Business Park and a 'Knowledge-Based Employment' site;<br>g) provision for the Rapid Transit System;<br>h) an 18-pitch Gypsy and Traveller Site of; and<br>i) a Park and Choose Facility. | National Grid is aware of this development proposal. An assessment of the inter-project cumulative effects has been undertaken and this is presented in **ES Appendix 17.3 Inter-Project Cumulative Effects [APP-284].** |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | Proposals for development within the Site Allocation Boundary (as defined by the DPD Policies Map) will be determined in line with the policies and requirements set out in the Development Plan Document which itself will be the subject of a five-yearly review. Decisions on planning applications for the Garden Community will be made by a Joint Committee containing representatives of Colchester City Council, Tendring District, Council and Essex County Council. Any proposed development within the Site Allocation Boundary that might prejudice the delivery or integrity of the Garden Community will be refused. Within the Local Plan period up to 2041, the Garden Community is expected to deliver approximately 3400 of the total 7,500 homes – with development continuing longer-term, beyond 2041, to completion. For this Local Plan period up to 2041, market and affordable housing delivery and employment land delivery from the Garden Community, irrespective of its actual location, will be distributed equally between Tendring District Council and Colchester City Council for the purposes of meeting respective housing and employment land requirements. Delivery of employment provision will also contribute to the supply for each of the Authorities requirements. The delivery of 18 pitches for 43 Gypsies and Travellers will also count equally, 9 pitches each, towards Tendring District Council and Colchester City Council's respective requirements. If, after taking into account its share of delivery from the Garden Community, if either of the authorities has a shortfall in delivery against the housing or Gypsy and Traveller pitch requirement for | |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | its area, it will need to make up the shortfall within its own area. It may not use the other authority's share of delivery from the Garden Community to make up the shortfall. Throughout the delivery of the Garden Community, Colchester City Council, Tendring District Council, and Essex County Council will continue to work together with developers and transport providers to maximise the potential opportunities and the reach of the Rapid Transit System and associated transport provision to serve communities in Colchester and Tendring. Policies SP8 and SP9 of the North Essex Authorities Shared Strategic Section One Plan (Adopted February 2021) appended to this Plan will be saved and continue to apply to the Garden Community where appropriate. All other policies are replaced. | |
| **Policy EN1: Nature Conservation Designated Sites** | Development proposals that have adverse effects on the integrity of habitats sites or Sites of Special Scientific Interest, either alone or in-combination, will not be supported. Contributions will be secured from qualifying residential development, within the Zones of Influence as defined in the adopted Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS, or brand name Bird Aware Essex Coast), towards avoidance and mitigation measures identified in the adopted strategy and any updates to the strategy. Reference to Bird Aware Essex Coast must be included on any signage or interpretation that relates to a Suitable Alternative Natural Greenspace (SANG) required in accordance with the Habitat Regulations Assessment. Signage and interpretation boards should explain the natural | **ES Chapter 8: Ecology and Biodiversity [AS-026]** explains how the Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation (including maintenance phases).<br>The reference to the need for signage a interpretation boards is not considered to be relevant to the Project as it relates to scheme comprising 100 or more dwellings. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | features of the open space and include places to rest within and throughout the SANG. Nature-based welcome packs will be required for new homeowners for schemes of 100 or more dwellings. | |
| **Policy EN2: Biodiversity Net Gain (BNG) and Environmental Net Gain** | All development proposals must deliver a minimum of 10% biodiversity net gain (BNG) in accordance with legislation. Proposals for habitat creation, enhancement and BNG should have regard to the Colchester City Strategic Biodiversity Assessment. All opportunities must be taken to maximise the delivery of onsite BNG. Alternative measures to delivering BNG should only be considered appropriate where it can be demonstrated that the required level of BNG cannot be achieved within the site. The sites listed in this policy and shown on the policies maps are the Council's preferred offsite BNG sites. These sites will deliver the best gains for biodiversity and include a range of habitat types. The strategic significance of these sites is high. Where offsite BNG units are required to meet the minimum 10% BNG where 10% BNG cannot be delivered onsite, the Council recommends that applicants purchase units from the following strategic offsite BNG sites where available:Abbotts Hall, Great Wigborough Maydays Farm, Haycocks Lane, West Mersea Chipping Farm, Copford Brook Meadows, TiptreeeThe Essex Local Nature Recovery Strategy (LNRS) contains strategic opportunity maps, which show the habitats and locations which have been identified as having 'strategic significance'. Only the LNRS strategic opportunities and the BNG sites listed in this policy can be assigned a score of 'high' | There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required. Furthermore, habitat removed during the construction will be reinstated (with the exception of planting restrictions associated with operational requirements as identified within the **Outline LEMP [AS-046].**<br>The Project aims to deliver a 10% net gain in biodiversity which requires off site biodiversity units to be purchased. National Grid will consider projects that align with the LNRSs in the three counties that the Project is located within. It is seeking to purchase units that provide wider societal benefits and deliver Environmental Net Gain. It is likely that this will include projects that support the Essex Green Infrastructure Strategy. The Project is aware of several nature recovery projects that interact with its alignment and have sought to minimise the potential for negative effects. The Project design allows for future plans for nature recovery so that river restoration projects for example will be able to proceed without adverse effects to the Project or nature. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | in the strategic significance category in the Biodiversity Metric. The Council will support development proposals that go beyond BNG and seek to demonstrate environmental net gain. | |
| **Policy EN3: Biodiversity and Geodiversity** | Development proposals where the principal objective is to conserve or enhance biodiversity and geodiversity interests will be supported in principle providing appropriate ecological evidence supports these actions, and the proposals are expected to conserve or enhance biodiversity. For all proposals, development will only be supported where it:<br>a) In the case of major applications, is submitted with a completed Essex biodiversity validation checklist; and<br>b) Is supported with appropriate ecological surveys by a suitably qualified person where necessary. Where a preliminary ecological appraisal indicates that further surveys are required to support a planning application, the results of all such surveys and associated details of necessary mitigation measures need to be submitted prior to determination; and<br>c) In cases where there is reason to suspect the presence of a protected species (and impact to), or Species/Habitats of Principal Importance, or locally important Species/Habitats, applications should be accompanied by an ecological survey, carried out at the appropriate time of year and taking into account appropriate weather conditions, assessing their presence and, if present, the proposal must be sensitive to, and make provision for their needs; and Demonstrates | The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce adverse impacts through the process of design development, and by embedding measures into the design of the Project. The mitigation hierarchy has been applied throughout development of the Project as part of the iterative EIA process which has informed the routeing and siting process. The Project has been designed to avoid, reduce or mitigate potentially significant adverse residual effects. Key elements of the application of the mitigation hierarchy in respect of the Project include:<br>• Sensitive routeing and siting of the alignment and Order Limits – as far as practicable, effects on identified environmental (including ecology) assets<br>• The **Outline CoCP [APP-300]** provides the preliminary framework for the principles and procedures that the Main Works Contractor(s) must implement to minimise, manage and mitigate the potential environmental impacts of construction works associated with the Project. The Outline CoCP is secured by Requirement 4 in the **Draft DCO [APP-056]. ES Chapter 8: Ecology and Biodiversity [AS-026]** presents the assessment of the likely significant ecology and biodiversity effects that could result from the |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | that, in the design of the proposal, the mitigation hierarchy has been followed with respect to ecological impacts. Where impacts on habitats and species cannot be avoided, a clear explanation of why alternative sites are not feasible and what proposed mitigation measures are necessary to address all likely significant effects; and Incorporates and maximises opportunities for the preservation, restoration, enhancement, connectivity and creation of a mosaic of habitats in accordance with the Essex Local Nature Recovery Strategy; and t Demonstrates that significant harm to brownfield sites of high biodiversity value is avoided and fragmentation of habitats is minimised; and<br>d) Incorporates biodiversity enhancement measures (in addition to mandatory biodiversity net gain) such as the creating space for nature design principles included in the Biodiversity Supplementary Planning Document; and<br>e) Focuses habitat creation and enhancement measures on the habitats that are already present in the area and retaining existing communities and species populations that have been recognised as having significance; and<br>f) Where development is proposed adjacent to, or including, a LoWS, the creation of new habitat to buffer it should be a priority of design and masterplanning.<br>Proposals for development that would cause significant direct or indirect adverse harm to nationally designated sites or other designated | Project. The chapter concludes there will be some temporary impact associated with the construction phase to both statutory designated sites and non-statutory designed sites. These temporary impacts will be mitigated through the standard mitigation measures set out in the **Outline CoCP [APP-300]** which will remove potential significant effects associated with dust, noise and hydrological effects on most statutory designated sites within the Study Area.<br>• The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, during the construction and operation (including maintenance) phases. There will be impacts on Habitats of Principal Importance e.g. arable field margins, lowland meadows, ponds, wet woodlands and hedgerows during the construction and operational phases. During the construction phase, habitats would be temporarily removed to create haul road, site compounds and storage areas. Habitats that are within the footprint of the permanent infrastructure that includes pylons CSE compounds and substations will be permanently removed. The Habitats of Principal Importance that would be lost on a temporary basis would be reinstated in line with the habitat reinstatement principles set out in Chapter 9 of the **Outline LEMP [AS-046]**.Mitigation for the permanent loss of habitat, including habitats of principal importance and important hedgerows would be |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | areas, protected species, Habitats and Species of Principal Importance and local importance, will not be permitted unless:<br>a) They cannot be located on alternative sites that would cause less harm; and<br>b) The benefits of the development clearly outweigh the impacts on the features of the site and the wider network of natural habitats; and<br>c) Satisfactory mitigation, or as a last resort, compensation measures are provided.<br>The Council will take a precautionary approach where insufficient information is provided about avoidance, mitigation and compensation measures and will require that this information is submitted prior to determination. Mitigation and compensation measures will be secured through planning conditions/obligations where necessary. A Construction Environment Management Plan, which includes details of all necessary ecological mitigation measures including protection of retained habitats and requirements for ecological supervision during works on site using a suitably experienced Ecological Clerk of Works, will be required by condition where necessary. Where external expertise is required to review and validate ecological survey reports, applicants may be requested to reimburse the Council, arrangements will be discussed at the pre-application stage and may be secured through a Planning Performance Agreement. | delivered through the creation / enhancement of habitat associated with the biodiversity net gain for the Project. Within the Order Limits six areas of land (defined as Environmental Areas) will be utilised around the Project's permanent assets, where there is sufficient space. To ensure the biodiversity net gain target is reached, any additional creation / enhancement will be delivered outside of the Order Limits, as identified in the **Biodiversity Net Gain Report [APP-299]**. National Grid has embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project. Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features such as woodland as far as reasonably practicable.<br>Those relevant to Ecology and Biodiversity include:<br>• The Project has committed to deliver at least 10% BNG. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the **Biodiversity Net Gain Report [APP-299]**. There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required.<br>• The design would allow for landscape planting around CSE compounds, and the new EACN |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | Substation, around the new Tilbury North (two options have been devised, one in the event that the Lower Thames Crossing Project is constructed, and the other if it is not)) and around the existing Norwich Main Substation<br>• Mitigation areas for landscape planting (and BNG) around permanent features are labelled 'Environmental Areas' and are presented on **ES Figure 4.1: Proposed Project Design [APP-133] and ES Figure 4.2: Proposed Project Design - Permanent Features [APP-134]**<br>As set out in Chapter 6 of the **Outline LEMP [AS-046]**, removal and manipulation of habitat known to support hazel dormouse would take place under licence to Natural England (the current licensing body). With details to be approved by Natural England. Vegetation removal will be overseen by the licensed ecologists with removal staged to enable vegetation to be searched for individual dormice before it is cut to ground level, with further searches to confirm the absence of hazel dormouse before stumps are moved and the area identified as 'free' of constraints. Nest boxes will be installed in areas of retained vegetation to mitigate for the loss of natural nest sites. Following the implementation of mitigation measures identified in the **Outline CoCP [APP-300]**, no residual significant adverse effects on roosting, foraging or commuting bats, Schedule 1 birds or wintering passage birds, reptiles, otter, water vole, badger or species of principal importance are identified. No significant effects on above species have been identified during the operational phase. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | As reported in ES Chapter 8: Ecology and Biodiversity [AS-026] the Project does not result in significant harm to biodiversity. |
| **Policy EN4: Irreplaceable Habitat** | Proposals that would result in the loss of irreplaceable habitats [as defined in The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024] will not be permitted unless there are wholly exceptional reasons and a suitable compensation strategy, to the satisfaction of the Council, exists. Proposals predicted to result in adverse impacts upon irreplaceable habitats must be accompanied by detailed survey information and clear evidence to support the exceptional reasons that justify such a loss. The compensation strategy must include contribution to the enhancement and management of the habitat. Proposals close to ancient woodland must include a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage. Where surveys show that other impacts are likely to extend beyond this distance, a larger buffer zone will be required. | The Project has been designed in a way which prioritises the retention of vegetation wherever practicable in accordance with good practice measures as outlined within the **Outline CoCP [APP-300].** Owing to the size of the Project it has not been possible to completely avoid the loss of such natural features. The **Outline LEMP [AS-046]** sets out the principal measures that are required to help avoid, minimise, mitigate and compensate (where relevant) the impacts to vegetation.<br>In relation to Ancient Woodlands, the physical extent of each ancient woodland along the Project has been mapped based on a combination of aerial imagery and based on information obtained from the ground truthing woodland surveys. Table 8.23 in **ES Chapter 8: Ecology and Biodiversity [AS-026]** lists the Ancient Woodlands identified within a 200m of the Project's Order Limits and identifies the proposed mitigation measure/commitment. The location and further information relating to all Ancient Woodlands is presented within **Appendix 8.1: Habitats Report and presented on Figure A8.1.3: Ancient Woodland Locations [AS-028].** There are no works proposed to Ancient Woodland within Colchester.<br>With regard to veteran trees, the **Ancient Woodland and Veteran Tree Strategy (Appendix B of the LEMP [APP-323]**) has been produced to detail the environmental measures that would be implemented to avoid, minimise, mitigate and compensate the |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | ancient and/ or veteran features likely to be impacted during construction and operation, as reported in **ES Chapter 8: Ecology and Biodiversity [AS-026], ES Chapter 13: Landscape and Visual (particularly in relation to Tree Preservation Orders and veteran trees) [APP-226]** as well as the **Outline LEMP [AS-046]** and **Arboricultural Impact Assessment (AIA) [APP-236].**<br>In accordance with the mitigation hierarchy set out in the Ancient Woodland and Veteran Tree Strategy in the first instance the Project has sought to avoid, minimise and rectify impacts to veteran trees. Where this isn't possible then suitable compensation is required. A total of 112 trees and four groups have been surveyed within the Project Study Area as veterans. Four individual veteran trees require removal, while 15 veteran trees and two veteran groups require crown management.<br>Within Colchester, Veteran Tree T566 (refer to Table 5.3 in the **Ancient Woodland and Veteran Tree Strategy (Appendix B of the LEMP [APP-323]**) is identified as requiring removal. Pruning works will be required to other veteran trees within Colchester including T775 and T782. The loss of T566 will be compensated for. The final mitigation/compensation measures, remediation works and long-term monitoring will be agreed at detailed design stage with the Project arboriculturist and the relevant landowners on a case-by-case basis. |
| **Policy EN6: Conserving and** | Development that will lead to substantial harm to or total loss of significance of a listed building, conservation area, historic park or garden or | **ES Chapter 11: Historic Environment [AS-068]** reports the assessment of the likely significant |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| **Enhancing the Historic Environment** | important archaeological remains, locally significant buildings, non-heritage assets (including the setting of heritage assets) will only be permitted in wholly exceptional circumstances where the harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss. Where development will lead to less than substantial harm this harm should be weighed against the public benefits of the proposal. Public benefits should clearly outweigh the harm in cases of substantial harm, this includes considering factors such as the optimisation of the assets viable use and the public interest in development. If development leads to less than substantial harm, this needs to be balanced against the public benefits of the proposal, focusing on the quality and public need of those benefits. Development affecting the historic environment should conserve and enhance the significance of the heritage asset and any features of specific historic, archaeological, architectural or artistic interest. There should be importance attributed to preserving the setting of the heritage assets acknowledging the relationship between the asset and its surroundings. In all cases there will be an expectation that any new development will enhance the historic environment or better reveal the significance of the heritage asset unless there are no identifiable opportunities available. Within designated Conservation Areas, proposals must preserve or enhance the character and appearance of the area in accordance with the statutory duty to consider these aspects under the Planning (Listed Buildings and Conservation Areas) Act 1990. Development should complement the form, | cultural heritage effects that could result from the Project.<br>National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. **ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets [APP-215]** found that the Project would not result in substantial harm to any heritage assets. **Chapter 11: Historic Environment [AS-068]** concludes that within Colchester City Council the project would result in permanent adverse magnitude of impact to 11 designated assets, 1 conservation area, and 7 non-designated heritage assets due to a change in setting but this impact would be at the lower end of the spectrum of less than substantial harm. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. The substantial public benefits and need for the Project, as set out in Chapter 5 of the **Planning Statement [APP-085]**, including supporting the UK's net zero target, enabling the connection in East Anglia of new low carbon energy generation, and reinforcing the transmission network clearly and demonstrably outweigh the less than substantial harm to |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | materials, and architectural style of existing buildings and spaces. Demolition of unlisted buildings or structures within a Conservation Area will only be permitted where it can be demonstrated that the building or structure harms or contributes little to the character or appearance of the area. In all cases, detailed justification, including an assessment of alternatives, will be required. Applicants for proposals within Conservation Areas should engage with the local community and stakeholders, including local historical societies, to ensure that the local significance of the area is recognised and respected in any proposed development. The adaptive reuse of heritage assets, including listed buildings, non-designated heritage assets, and buildings within Conservation Areas, is encouraged, provided that the proposed changes do not harm the significance of the asset. The preservation of key features, materials, and architectural elements should be a priority, and any alterations should be sympathetic to the asset's character. In assessing proposals for development affecting heritage assets, consideration will be given to the broader public benefits that the development may bring, including providing access to heritage sites, educational opportunities, and enhancing public understanding of Colchester's historic environment. All development proposals should promote the adaptive reuse of buildings and the role of heritage in sustainable development (such as retrofitting for energy efficiency or considering climate change in heritage management). Heritage Impact Assessments will be required for proposals related to or impacting on the setting of heritage | designated heritage assets and the non-designated heritage assets of scheduled quality. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Colchester City Council have raised concerns around the assessment methodology in regards to non-designated heritage assets and there are still concerns that not all non-designated heritage assets have been included in the assessment. This topic is therefore under discussion. See **Draft Statement of Common Ground with Colchester City Council [APP-096]** for more details. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | assets so that sufficient information is provided to understand the significance of the heritage assets and to assess the impacts of development on historic assets, together with any proposed mitigation measures. | |
| **Policy EN7: Archaeology** | All development proposals that may affect archaeological sites or areas of archaeological potential must include a desktop study and, where necessary, an archaeological field evaluation to assess the impact on below-ground heritage assets. A written scheme of investigation (WSI) will be required to outline the methodology for archaeological investigation, excavation, or preservation in situ, as appropriate. In cases where archaeological remains are likely to be impacted, the preferred approach is to preserve the remains in situ. However, where this is not feasible, appropriate recording and excavation will be required before any development can proceed. Results of such investigations should be deposited with the Historic Environment Record (HER) and made publicly available. | **ES Chapter 11: Historic Environment [AS-068]** report, assesses the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. **Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** sets out appropriate additional mitigation for archaeology. The Project's mitigation strategy has been developed in consultation with heritage stakeholders, including the Council and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording.. |
| **Policy EN8: Flood Risk and Sustainable** | Development should be directed away from land at risk of flooding in accordance with the National Planning Policy Framework and Planning Practice | The Project directs development to locations with the least impact on flooding or water resources. The **FRA [APP-331]** submitted as part of the application for |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| **Drainage Systems (SUDs)** | Guidance. Planning permission will only be granted where it has been demonstrated that:<br>a) the site will remain safe from all types of flooding throughout the lifetime of the development; and<br>b) flood risk will not increase on or off site as a result of the development.<br>Proposals that include measures to enhance the flood resilience of new or renovated buildings will be encouraged, particularly in areas with a history of local flooding. Where buildings have been demolished within the functional floodplain (Flood Zone 3b) for a significant length of time (i.e. over a year), the land should be reverted back to functional floodplain and consequently, development should be avoided within these areas. Where a building(s) is already located in the functional floodplain, any proposals to regenerate or replace such building(s) must not increase the building footprint any greater than the existing footprint. The Colchester Surface Water Management Plan identifies Critical Drainage Areas. New developments within Critical Drainage Areas will be required to provide or contribute towards the provision of flood mitigation options via CIL/S106 contributions, as identified in the Colchester Surface Water Management Plan (and its successor). This is to reduce or mitigate the risk of flooding to existing properties located within the Critical Drainage Area and to accommodate the drainage needs of new developments. Where a site specific flood risk assessment is required in accordance with national policy this should be prepared in accordance with the Colchester Level 1 | development consent focusses on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources.<br>A sequential approach has been taken in siting the Project. The majority of the Project lies within Flood Zone 1 and in zones that are at low risk of flooding from other sources. **ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]** states that the parts of the Project which lie in Colchester City Council area (Section D of the route) is mostly located in Flood Zone 1, these comprise of pylons and one CSE compound. Additionally, the FRA concludes that there are no pylons proposed in the floodplain in Section D.<br>The FRA has concluded that the Project during its construction would be generally at low risk of flooding from rivers. Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures. These measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk. During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the FRA. The **Outline CoCP [APP-300]** describes the good practice measures including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | Strategic Flood Risk Assessment. A Sustainable Drainage Strategy should also be submitted as part of a planning application where a site specific flood risk assessment is required. Any Sustainable Drainage Strategy should be developed having regard to the latest guidance including the CIRIA SuDS Manual, Essex County Council SuDS Design Gude, Essex County Council Green Infrastructure Strategy and Colchester's Green Network and Waterways Guiding Principles (and their successors). Where sites are at risk of groundwater flooding, construction phase groundwater monitoring during periods of high groundwater (October – March) should be included in the Flood Risk Assessment to inform the design and any mitigation measures, unless adequate justification can be provided by the applicant to exempt the proposed development from this requirement. All new development will be required to incorporate water management measures to reduce surface water run-off and adverse impact to water quality, to ensure flood risk is not increased elsewhere. Nature-based solutions are a priority for flood and water management. Surface water should be managed in accordance with the drainage hierarchy and be managed close to its source, at the surface and mimic natural drainage as much as possible. All development proposals should incorporate Sustainable Drainage Systems and consider:<br>a) Natural flood management at a catchment scale, including watercourses and coastal areas; | from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime. The **FRA [APP-331]** states that access roads and haul roads, as well as areas where impermeable material will be installed in areas where heavy equipment would be used, will also have suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff appropriate to local conditions. Appendix C of the **FRA [APP-331]** contains further details on SuDS. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | b) Existing drainage features such as ditches and ponds to be retained and incorporated into developments proposals where possible;<br>c) Developments close to rivers should consider the opportunity to improve and enhance the river environment;<br>d) Prioritisation for soft landscaped features;<br>e) Inclusion of grey and rain water reuse systems such as green roofs and water butts;<br>f) Inclusion of multifunctional Sustainable Drainage Systems that enhance biodiversity and provide aesthetic and amenity value, and safe public access;<br>g) Inclusion of permeable paving for driveways, paths and roads;<br>h) The management and maintenance of all Sustainable Drainage Systems for the lifetime of the development including responsibility and that these remain economically proportionate.<br>Sustainable Drainage Systems should be designed to be multifunctional, however this should not undermine their function, and these features should not be considered as making a site's entire contribution for open space as required by Policy GN1. Development must conserve and enhance the natural flood storage value of the water environment, including watercourse corridors and catchments. Proposals that open up culverted watercourses, where it is safe and practicable, will be supported. | |
| **Policy LC1: Landscape** | All proposals and associated land use change or land management must demonstrate that they are | The assessment of effects on Dedham Vale National Landscape is presented in **ES Appendix 13.5:** |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | informed by, and are sympathetic to, the landscape character and qualities of the locality. A Landscape and Visual Impact Assessment (LVIA) is required for all major applications and must be prepared in accordance with Landscape Institute guidelines. In considering development proposals, the Council will take every opportunity to reinforce, restore, conserve, strengthen or enhance, as appropriate, the landscape character of the area in which development is proposed, as well as opportunities to create new character. Development must comply with all the following criteria: Development must safeguard or strengthen tranquillity, features and patterns that contribute to the landscape character and local distinctiveness of the area, protect rural openness and sense of place and protect natural landscape features where they make a contribution to the historic environment. The scale, design, materials and landscaping measures are appropriate and would lead to an enhancement of the character of the landscape.<br>a) Proposals must consider ecological and geological features, identifying areas suitable for habitat creation, and incorporate measures in the landscape plan with details of management and maintenance.<br>All development should take into account the sensitivity of the particular landscape to accommodate change. Development, or associated land use change or land management, which does not significantly adversely affect the landscape character of an area, will normally be allowed. | **National Landscape Assessment Study [APP-235]**. The setting study is included in Annex A: Dedham Vale National Landscape Setting Study. Undergrounding is proposed in four locations, including through the Dedham Vale National Landscape and part of its setting as an embedded mitigation measure to minimise impacts on its setting, as set out in **ES Chapter 13: Landscape and Visual [APP-226].** A landscape strategy has been prepared for the Environmental Area at the CSE compound within Colchester City Council which provides a collaborative approach to delivering landscape and biodiversity mitigation (**Outline Landscape and Ecological Management Plan [AS-046]**) as secured by Schedule 3 of the **Draft DCO [APP-056]**. This landscape strategy has been developed in recognition of the local landscape policies and landscape character, considering the opportunities for local landscape and biodiversity enhancements. It has been developed as part of the iterative process of design and assessment.<br>Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the LVIA study area, as illustrated on 6.13.F4 Environmental Statement Figure 13.4 - **Settlements and Infrastructure [APP-240]**. There are also a high number of nationally designated landscapes, valued for their natural beauty, which have historically been designated despite the presence of transmission infrastructure. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| | Development must have regard to the Colchester Landscape Character Assessment 2024 to identify the character areas and features of the affected landscape. Development must take into account the general guidelines and landscape character area specific guidelines. The Council considers that landscape character areas with 'high' inherent value and sensitivity as per Appendix A of the Colchester Landscape Character Assessment 2024, are valued landscapes. Development within valued landscapes will only be permitted where it would protect and enhance the characteristics that contribute towards its character. Development should avoid reduction of and encourage traditional farming practices (including traditional orchards), retaining and enhancing sense of place whilst recognising the need to adapt to and mitigate against the effects of climate change. Development on Land classified as Agricultural Grade 1 (except for renewable energy projects) will not be permitted unless a landscape strategy, which would compensate for the loss or harm, is secured or where there are overriding public benefits arising from the development. | The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be some significant effects on landscape character and visual amenity as reported in the LVIA **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].** |
| **Policy LC2: Dedham Vale National Landscape** | Development will only be supported within or on land within the setting of the Dedham Vale National Landscape that:<br>a) Makes a positive contribution to the purpose, natural beauty and special qualities of the National Landscape; and<br>b) Does not adversely affect the tranquillity and the National Landscapes good quality night/dark skies, taking account of guidance in The Dedham | **ES Appendix 13.5 National Landscape Assessment Study [APP-235]** has been produced to support **ES Chapter 13: Landscape and Visual [APP-226]**. The southern half of the Dedham Vale National Landscape is within Colchester Borough (within Essex). National Landscapes are shown on **ES Figure 13.1: LVIA Study Area and Landscape Designations [APP-237].** |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| | Vale National Landscape Lighting Design Guide 2023; and,<br>c) Does not adversely affect the character, quality views within, into and out of the National Landscape, and distinctiveness of the National Landscape or threaten public enjoyment of these areas, including by increased motorised vehicle movement; and<br>d) Supports the wider environmental, social and economic objectives as set out in the Management Plan 2021 -2026 for the Dedham Vale National Landscape and Stour Valley (and successor management plans).<br>e) Furthers the purpose of the National Landscape as per the legal test. | In accordance with the policy, the Project would be undergrounded through Dedham Vale National Landscape and adjacent landscapes. Further information about undergrounding is provided in the **Design Development Report [APP-122]** and **Consultation Report [APP-067 and APP068].**<br>**ES Chapter 13: Landscape and Visual [APP-226]** identifies the potential for major and significant effects during the construction phase however these would reduce to minor and not significant effects during operation once the underground cables are covered over and land use and landcover reinstated as far as possible.<br>In accordance with the policy, the Project is a national infrastructure project of public interest therefore the Project's location within the National Landscape is considered to constitute exceptional circumstances. The **Planning Statement [APP-085]** sets out the need for the Project in particular the need for significant reinforcements both in the form of new substations and transmission circuits to provide connections for these new customers and to ensure that power can be transferred securely to the onshore demand centres to meet the needs of electricity consumers in Britain. |
| **Policy PP18: Land North of A120, Marks Tey Growth Area** | Land to the north of the A120 has been promoted for a Garden Village scale, mixed-use development, but the development potential within the plan period is limited because of infrastructure constraints. It will be important when planning for the first phase of development that the whole site area is masterplanned to ensure residential development is | The Norwich to Tilbury Project will interact with Land North of A120, Marks Tey Growth Area. National Grid responded to the Colchester Preferred Options Local Plan Regulation 18 Consultation in January 2026. The response noted that: Overhead electricity lines can be successfully co-located with development provided that the statutory safety clearances are |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| | supported by infrastructure including schools, community facilities and open space. In addition to the infrastructure and mitigation requirements identified in Policy ST 7 and subject to compliance with all other relevant policies, in particular those concerned with highway capacity, development will be supported on land to the south of the larger site identified on the policies map which provides within the plan period Approximately 1,000 new dwellings of a mix and type of housing to meet evidenced needs which is compatible with surrounding development;<br>a) A mix of other uses which support a sustainable community appropriate to the scale of development including public open space to accommodate formal and informal sport and leisure, community facilities, local services and local centres;<br>b) Substantively in excess of 10% of the allocation area must be provided as open space. This should include strategic open space in addition to multiple areas of less formal and more incidental open space;<br>c) Safe and suitable site access to required highway design standards. Point(s) of vehicular access will need to be agreed with the Highway Authority and it will be demonstrated that the proposal would not be detrimental to highway capacity or safety;<br>d) Active travel links that maximise opportunities for enhanced connectivity within the site and to the surrounding area; and opportunities to maximise | maintained in accordance with the Electricity Safety, Quality and Continuity Regulations 2002. National Grid has produced its Design Guidelines for development near high voltage overhead lines, which set out these statutory safety clearances and provide detailed guidance for developers on how successful co-location can be achieved in practice.<br>Accordingly, National Grid does not consider that the Norwich to Tilbury Project would adversely affect the delivery of the proposed site allocations, subject to the future development of those sites having full regard to this guidance. In this context, National Grid recommends that the policies relevant to these allocations explicitly reference the need to comply with both the Electricity Safety, Quality and Continuity Regulations 2002 and National Grid's Design Guidelines for Development Near Pylons and High Voltage Overhead Power Lines, in order to facilitate successful development, should the Norwich to Tilbury Project Development Consent Order be granted. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | the use of sustainable transport, including links to the railway station;<br>e) Mature trees and hedgerows should be retained. Ponds and woodland within the site must be retained and buffered. Onsite BNG measures should focus on creating a mosaic of grassland, scrub and trees and be located around existing ponds (including offsite ponds) and woodland;<br>f) As a strategic site, there is potential for a range of habitat creation measures which should be maximised. A core of onsite BNG measures should be located together to provide a substantive area for biodiversity, with associated connectivity through and beyond the site. This core should include the corridor of the Roman River (enhanced to provide the required watercourse unit uplift), and LoWS Co27 and the woodland Priority Habitat, appropriately buffered and connected. Much of the site would be suitable for the creation of chalky boulder clay grassland; iSupport will be given to delivering standing freshwater habitat, woodland or grassland habitats within or adjacent to the site to support the delivery of the strategic creation opportunities in the Essex LNRS;<br>g) Screening comprising locally appropriate tree belts, hedgerows and/or woodland will be required along the site boundaries to ensure that development is sensitively integrated into the landscape to reflect and reinforce rural character;<br>h) Ensure connection within and throughout the site to Public Rights of Way to provide green | |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| | infrastructure connections and recreational access to the countryside;<br>i) Linkages to the proposal for a Roman River corridor nature recovery area, as shown on the policies map;<br>j) Development must conserve, and where appropriate, enhance the significance of heritage assets (including any contribution made by their settings). Designated heritage assets close to the allocated site includes two Grade I and 27 Grade II Listed Buildings as informed by the Stage 1 HIA;<br>k) Liaise with ECC as the Minerals and Waste Planning Authority on mineral and waste matters. A Minerals Resource Assessment as part of any planning application. Should the viability of extraction be proven, the mineral shall we worked in accordance with the scheme/masterplan as part of the phased delivery of non-mineral development. Undertake a Mineral Infrastructure Impact Assessment given the site's proximity to Marks Tey Brickworks; Demonstrate adequate capacity for managing wastewater including proposed phasing requirements or alternative solutions to the satisfaction of the Council and Anglian Water;<br>l) A range of measures in addition to prioritising SuDs (Policy EN8) and water efficiency measures to reduce the risk on impact on the WRC capacity as a result of planned growth including:<br>i. Removal of unrequired network flows; | |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | ii. Targeted education to include new residents of the development;<br>iii. Reduction in the demand for potable water.<br>m) Development must not discharge surface water to the foul sewer network;<br>n) Any site specific infrastructure requirements from the IDP (likely to include education provision, highway mitigation, water and wastewater and specific community / open space provision);<br>Before granting planning consent, wintering bird surveys will be undertaken at the appropriate time of year to identify any offsite functional habitat. In the unlikely event that significant numbers are identified, development must firstly avoid impacts. Where this is not possible, development must be phased to deliver habitat creation and management either on or off-site to mitigate any significant impacts. Any such habitat must be provided and fully functional before any development takes place which would affect significant numbers of SPA birds.aDevelopment proposals will only be supported where they accord with a comprehensive masterplan in relation to the entire site, that has been agreed with the Council prior to submission of any planning application. The masterplan must be of sufficient detail to ensure optimal placemaking and housing delivery outcomes for the allocation and should be informed by an appropriate evidence base. The masterplan should be developed in collaboration with the Council, and relevant infrastructure providers and through engagement with the local community. It should be | |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | informed by use of design review. Where appropriate and necessary the masterplan shall be supported by, parameter plans, design codes or guidance. All development Proposals within Marks Tey parish will also be determined against the policies in the Marks Tey Neighbourhood Plan where relevant (adopted April 2022) where they are up to date and relevant. | |
| **Tendring Local Plan Review 2025 – 2042 and Beyond Preferred Options: Regulation 18 Consultation (February 2026)** | | |
| **Non-strategic Policy HP5**<br>**Open Space, Sports and Recreational Facilities** | The Council will work with partners and sports providers across the District to maintain, expand and improve the quality and accessibility of public open space, sports and recreational facilities of different types and will aim to achieve and exceed standards set out in the Council's latest Open Spaces Strategy.<br>Development that would result in the loss of the whole or part of areas designated as Safeguarded Open Space, as defined on the Policies Map and Local Maps (ornew open spaces created on site as a part of residential and mixed-use new development or off-site utilising financial contributions secured from new development) will not be permitted unless the following criteria are met: a. the site is replaced by the provision of<br>a) new site at least equal in quality and size and accessible to the community, which the existing site serves;<br>b) it is demonstrated that there is no longer a demand for the existing site;<br>c) the site is not appropriate for other open space functions; and | An Open Space Assessment has been prepared and reported in **Appendix B Open Space Assessment of the Planning Statement [APP-085].** Open Space is defined in National Policy Statement EN-1 as including green and blue infrastructure. The Project has sought to avoid areas of open space, including green and blue infrastructure; however, within the Tendring District area the Project interacts with two bodies of water in Ardleigh, Tendring which comprise of Ardleigh Fishing Pond and Ardleigh Reservoir.<br>The fishing pond at Ardleigh is identified as a Local Green Space in the Ardleigh Neighbourhood Plan and Tendring Local Plan.<br>At Ardleigh Fishing Pond fishing will be prohibited in totality, given the limited scale of the pond.<br>The **Design Development Report [APP-122]** outlines the alternative alignments which were considered to avoid oversailing the fishing pond. Alternatives to avoid oversail of the water body, to allow continuation or intensification of angling were considered. These would necessitate multiple changes of direction, given routeing constraints and the presence of residential properties, whether |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | d) the development of the site would not result in the loss of an area important to visual amenity.<br>Where safeguarded Open Space is additionally shown as 'Local Green Space' on the Policies Map and Local Maps or in an adopted Neighbourhood Plan, it will be given extra protection and its loss in whole or part will not be permitted over the time-frame of this Local Plan.<br>The Council will seek to plan positively to enhance the beneficial use of Open Spaces, including looking for opportunities to provide access; to provide outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity and to improve damaged and derelict land. The Council will also support the delivery of the Essex Local Nature Recovery Strategy, providing protection and enhancement to the Areas of Particular Importance for Biodiversity identified within the Strategy. The Council will ensure that land identified as Strategic Combined Opportunity Areas is safeguarded and enhanced to deliver the additional nature recovery benefits proposed, including improved ecological connectivity, strengthened habitat networks and opportunities for landscape-scale biodiversity enhancement. Sports and recreational facilities will be protected in line with the requirements of Policy HP2. All new residential or mixed-use developments will contribute proportionately towards the provision, improvement and maintenance of public open space and play equipment through: • financial contributions secured via Community Infrastructure Levy (CIL), s106 legal agreements or an appropriate alternative | passing to the east (residential properties within 200 m) or west (residential properties within around 100 m) of the water body. These multiple angle changes would reduce consistency with the Holford Rules and increase effects to multiple residential properties close to the alignment in this area. Due to the limited and informal level of angling activity and the additional environmental effects from the alternatives, retaining the straighter 2023 preferred draft alignment and oversailing the waterbody was preferred. The presence of a 400 kV overhead line and the need to maintain a 30 m clearance for angling activities prevents angling activities from continuing on this site, and therefore there will be a direct impact on the use of the site. National Grid has proposed to create a replacement fishing lake to the immediate east however, there has been no agreement on this.<br>For Ardleigh Reservoir angling will be prohibited within 30 m of the overhead lines. Angling will remain possible outside of this area on this part of the reservoir and on the wider reservoir, where already permitted.<br>The Open Space Assessment found that there is a range of angling facilities within 10 miles of these sites which are considered a suitable alternative.<br>Further to this, it is considered that the positive benefits of the Project (including need) outweigh the loss of the angling provision. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | mechanism; and, • with on-site provision where developments fall within the site-size thresholds set out below. All new residential or mixed-use developments will provide Green and Blue Infrastructure in line with Policy PPL4, with appropriate management arrangements put in place for their ongoing management and maintenance.<br>Developments on sites of 3 hectares or larger will additionally be required to provide on-site public open space. This provision must include usable public open space and, where specified, play equipment, allotments, playing fields and built community sports facilities. The minimum proportion of the gross site area to be provided as open space is as follows, unless otherwise specified in any sitespecific policies in this Local Plan:<br>Sites of 3 hectares and over, but less than 10 hectares: at least 10% of the gross site area as public open space, which will include play equipment;<br>Sites of 10 hectares and over, but less than 30 hectares: at least 20% of the gross site area as public open space, which will include play equipment and allotments;<br>Sites of 30 hectares and over, but less than 70 hectares: at least 30% of the gross site area as public open space, which will include play equipment and allotments, and an element of playing fields and/or built community sports provision; and<br>Sites of 70 hectares or more: at least 40% of the gross site area as public open space, which will | |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | include play equipment and allotments, and both playing fields and built community sports facilities.<br>All public open space, play areas, playing fields and indoor sports facilities shall be laid out in accordance with a specification agreed by the Council and avoid adverse impact on existing and future amenity. This specification will include appropriate provision for hard and soft landscaping, seating and other furniture, and waste bins. No single area of usable open space may be smaller than 0.3 hectares in size. The areas of open space required shall not include landscape buffers within 2 metres of any boundary, areas for wildlife mitigation or similar designations/requirements nor include areas for SUDs. Long-term management and maintenance arrangements must be secured through a s106 legal agreement, or other appropriate mechanism. These arrangements must provide for either:<br>the transfer of the land to the Council, with a financial contribution towards ongoing maintenance, to be agreed by the Council; or<br>an alternative management or stewardship arrangement that ensures the ongoing maintenance of the space in perpetuity. If new development would be better served by existing or proposed open spaces within an accessible distance (having regard to the standards set out in the latest Open Spaces Strategy), a financial contribution in lieu of on-site provision may be sought towards any necessary improvement or expansion of existing, or the delivery of new, open spaces and/or sports facilities. | |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| **Strategic Policy PP6. Employment Sites.** | The Council will seek to protect existing employment sites, as shown on the relevant Policies Maps and Local Maps. Sites within use classes B2 and B8 will be safeguarded for these purposes. Employment sites falling within Use Class E(g) will be retained and will continue to provide for the employment needs of the District. Proposals for employment uses falling outside of use classes B2, B8, Eg(ii) and Eg(iii) or other established activities (such as retail, offices, other town centre uses, or other 'sui generis' uses) on protected employment sites will be considered on their merits and against other relevant policies within the Local Plan. Proposals for non-employment uses on these sites will only be permitted if:<br>a) it can be demonstrated that the land or premises have become inherently unsuitable for any form of employment use and there is clear and robust evidence of appropriate marketing with registered commercial agents at a reasonable price to demonstrate no realistic prospect for continued employment use; or<br>b) the alternative use will either facilitate or result in wider economic regeneration benefits that outweigh the loss of employment land or premises on the protected site for existing or potential employment use; or<br>c) the alternative use will ease or resolve demonstrable longstanding and otherwise irresolvable harmful conflicts between land uses. If criteria a) b) or c) are met, the proposal must not have an adverse impact on the operation of any | In accordance with national policy requirements, the Project has been designed following the mitigation hierarchy. At the routeing and siting stage, the Project design process was informed by the Holford and Horlock Rules to avoid impacts where possible. These established guidelines informed the evaluation criteria and how the mitigation hierarchy was applied during the options selection process.<br>The adopted design approach is set out within **ES Chapter 3: Alternatives** [APP-127] which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the application for development consent.<br>The Project has been designed to avoid local plan allocations. The Project is in proximity to the existing employment allocation at Crown Business Centre. As reported in the **Design Development Report** [APP-122], National Grid has actively engaged with the promoters of developments to the north and south of Wick Lane near the junction with the Old Ipswich Road (around TB20). Through those discussions, the potential for interaction between the Project infrastructure and third-party developments has been identified |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | remaining businesses on the protected site and must not give rise to any incompatibility between land uses. | |
| **Strategic Policy PPL1 Development and Flood Risk** | All development proposals should include appropriate measures to respond to the risk of flooding on and/or off site. Within the Flood Zone (which includes Flood Zones 2 and 3, as defined by the Environment Agency) shown on the Policies Map and Local Maps, or elsewhere involving sites of 1ha or more, development proposals must be accompanied by a Flood Risk Assessment. Where development is classified as "more vulnerable" the Flood Risk Assessment (FRA) should demonstrate that there will be no internal flooding in the event of a "event flood now or in the future". The FRA should demonstrate that in the event of a breach or failure of flood defence infrastructure, refuge will be available above flood levels and that a means of escape is possible from first floor level.<br>All development classified as "More Vulnerable" or "Highly Vulnerable" within Flood Zone 2 and 3 should set finished floor levels 300mm above the known or modelled 1 in 100 annual probability (1% AEP) flood level including an allowance for climate change. All new development within Flood Zones 2 and 3 must not result in a net loss of flood storage capacity, unless there is compensation on site or, if not possible, adjacent off-site capacity. Where possible opportunities should be sought to achieve an increase in floodplain storage.<br>All major development proposals should consider the potential for new Green and Blue Infrastructure to | The **FRA [APP-331],** has been submitted as part of the application for development consent focussing on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. A sequential approach has been taken in siting the Project. The majority of the Project lies within Flood Zone 1 and in zones that are at low risk of flooding from other sources. As addressed in the **FRA [APP-331],** there are no pylons proposed in the floodplain in Tendring District area (Section C of the Project route). The Risk of Flooding from Surface Water map (see **ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]**) shows that the majority of land within Section C is at very low risk of surface water flooding. As shown in the **FRA [APP-331]**, where there are interactions between the Project and any high-risk zone during construction, these are mostly where temporary haul roads and pylon construction working areas are proposed.<br>Due to its linear nature and the geographical extent of the Project, some components, namely pylons, must necessarily be located in areas with a medium and high risk of flooding (Flood Zones 2 and 3). The permanent Project works which lie within Flood Zone 3 are restricted to a small number of pylons for the overhead lines. These are designed such that they are resilient to flooding, ensuring the Project would be safe and could continue to operate. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | help mitigate potential flood risk and include such Green and Blue Infrastructure where appropriate, in accordance with Policy PPL4 of this Local Plan.<br>All development proposals will be considered against the National Planning Policy Framework's 'Sequential Test', to direct development toward sites at the lowest risk of flooding, unless they involve land specifically allocated for development on the Policies Maps or Local Maps.<br>The area for this test will relate to the catchment area of the development proposed and should always be appropriate in nature and scale. Usually, this area will not extend beyond the town, city or local villages it relates to. Alternative sites could be two or more sites and do not need to be owned by the applicant.<br>Where new development cannot be located in an area of lower flood risk and is otherwise sustainable, the Exception Test will be applied in accordance with the National Planning Policy Framework so that it is safe and meets wider sustainability needs. | Details of the Sequential and Exception Test are provided in Sections 5.1 and 5.2 of the **FRA [APP-331]** submitted as part of the application for development consent. The Project is classified as 'essential infrastructure' with respect to flooding vulnerability in the NPPF. The CSE compound, which represents the parts of the Project that are most vulnerable to flooding, is situated in Flood Zone 1, satisfying the Sequential Test.<br>The FRA has concluded that the Project during its construction would be generally at low risk of flooding from rivers. Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures. These measures would also protect construction workers, limit damage to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk.<br>During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the FRA. Above ground structures such as pylons and below ground structures such as the underground cable are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement.<br>Permanent above ground infrastructure for the Project in the floodplain would be limited to a small number of the pylons for the overhead line. The requirements for compensation of loss of floodplain |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | storage associated with these pylons is secured by commitment W17 in the **Outline CoCP [APP-300]**. |
| **Strategic Policy PPL4 Biodiversity and Geodiversity** | Sites designated for their international, European and national importance to nature conservation, including Ramsar sites; Special Protection Areas (SPAs); Special Areas of Conservation (SACs); Marine Conservation Zones (MCZs); National Nature Reserves (NNRs); and Sites of Special Scientific Interest (SSSIs) will be protected from development likely to have an adverse effect on their integrity.<br>Where proposals for development are likely to significantly impact upon International and European sites, applications must be supported by a Habitats Regulation Assessment (HRA) to provide sufficient information to the Council to establish the likelihood and nature of impacts before a decision can be made. If necessary, this may need to be followed by a more detailed 'Appropriate Assessment' of the impacts.<br>An Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) (now called Essex Coast Bird Aware) has been completed in compliance with the habitats Directive and Habitats Regulations. Contributions will be secured, within the Zones of Influence, towards mitigation measures identified in RAMS.<br>As a minimum, there should be no significant impacts upon any protected species, including European Protected Species and schemes should consider (and include provision, as may be relevant for) the preservation, restoration or re-creation of priority habitats, ecological networks and the | **ES Chapter 8: Ecology and Biodiversity [AS-026]** presents the assessment of the likely significant ecology and biodiversity effects that could result from the Project. The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats during the construction and operation (including maintenance).<br>The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. **ES Chapter 8: Ecology and Biodiversity [AS-026]** concludes there will be some temporary impact associated with the construction phase to both statutory designated sites and non-statutory designed sites. These temporary impacts will be mitigated through the standard mitigation measures set out in the **Outline CoCP [APP-300]** which will remove potential significant effects associated with dust, noise and hydrological effects on most statutory designated sites within the Study Area.<br>Where the construction phase results in temporary habitat damage or loss the habitat will be reinstated post-construction ensuring there would be no long-term adverse impact. Some of the woodland habitats |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | protection and recovery of priority species populations.<br>Sites designated for their local importance to nature conservation, including Local Wildlife Sites (LoWS), Ancient Woodlands Protected Verges and aged or veteran trees will be protected from development likely to have an adverse impact on such sites or features. Proposals for enhancement of special interest and features will be supported, subject to other material planning considerations.<br>All new development must be designed to include new green and blue infrastructure and protect and enhance existing green and blue Infrastructure in the local area. Proposals will be expected to demonstrate:<br>how opportunities for preservation, restoration, enhancements and connection of natural habitat as set out in Essex Local Nature Recovery Strategy (LNRS) have been maximised; and<br>how biodiversity enhancement and net gain measures will be incorporated, including the use of habitat restoration and natural regeneration.<br>Any new or existing green and blue Infrastructure will be protected, managed and where necessary enhanced by:<br>a) aligning GI design with the LNRS on development proposals and managing development to secure a net gain in green infrastructure;<br>b) supporting projects set out in the Essex Green Infrastructure Strategy; | cannot be replaced due to safety clearances and, therefore, mitigation in the form of compensation planting is proposed.<br>The **HRA Report [APP-082]** provides the relevant information to inform the Secretary of State's Habitats Regulations Assessment (HRA) for the Project.<br>The Stage 2 Appropriate Assessment set out in the **HRA Report [APP-082]** identified no adverse effects on the integrity of a European Site (following the implementation of mitigation), and therefore the HRA does not require progression to Stage 3 (derogation) of the HRA process.'<br>In addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat.<br>The Project aims to deliver a 10% net gain in biodiversity which requires off site biodiversity units to be purchased. National Grid will consider projects that align with the LNRSs in the three counties that the Project is located within. It is seeking to purchase units that provide wider societal benefits and deliver Environmental Net Gain. It is likely that this will include projects that support the Essex Green Infrastructure Strategy. The Project is aware of several nature recovery projects that interact with its alignment and have sought to minimise the potential for negative effects. The Project design allows for future plans for nature recovery so that river restoration projects for example will be able to |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | c) not permitting development that compromises the integrity of the overall Green Infrastructure networks;<br>d) investing in enhancement and restoration where opportunities exist; and<br>e) using developer contributions to facilitate improvements to their quality and accessibility.<br>Proposals for new development should be supported by an appropriate ecological assessment. Where new development would harm biodiversity or geodiversity, planning permission will only be granted in exceptional circumstances, where the benefits of the development demonstrably outweigh the harm caused and where adequate mitigation or, as a last resort, compensation measures are included, to ensure a net gain, in biodiversity.<br>Proposals for new infrastructure and major development should consider the potential for enhanced biodiversity, appropriate to the site and its location, including, where appropriate, within Green Infrastructure.<br>Any proposed development on sites which may support protected species will require relevant survey(s), undertaken by a suitably qualified ecologist. If protected species are present, a suitable mitigation plan will be required prior to planning permission being granted.<br>To help with the increase in biodiversity, all new development should consider the installation of bird and bat boxes, swift and bee bricks, log piles, | proceed without adverse effects to the Project or nature.<br>In relation to ancient woodlands, the physical extent of each ancient woodland along the Project has been mapped based on a combination of aerial imagery and information obtained from the ground truthing woodland surveys. Table 8.23 in **ES Chapter 8: Ecology and Biodiversity [AS-026]** lists the ancient woodlands identified within 200 m of the Project's Order Limits and identifies the proposed mitigation measure/commitment. The location and further information relating to all ancient woodlands is presented within **Appendix 8.1: Habitats Report, on Figure A8.1.3: Ancient Woodland Locations [APP-159]**. In addition, the Project has considered 11 woodlands to be ancient woodland within **ES Chapter 8: Ecology and Biodiversity [AS-026]** due to the Local Wildlife Site citations mentioning these woodlands support ancient woodland features. These woodlands have therefore been included in the impact assessment as ancient woodland.<br>Potential impacts (excavation and non-excavation), in the absence of mitigation, were identified at 10 ancient woodland parcels (five within ancient woodlands themselves and five within the 15 m buffer root protection zone (RPZ)). Project commitments to standard mitigation measures have completely removed potential impacts to five of these ancient woodlands and reduced impacts to one further ancient woodland<br>Out of the remaining ancient woodlands none are located within Tendring (Section C of the Project |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | hibernacula, and hedgehog highways/fencing and houses. | route), therefore there will be no impacts to ancient woodlands. A comprehensive explanation of the Project approach to ancient woodland avoidance and minimisation of impact on ancient woodland is detailed in **Appendix B: Ancient Woodland and Veteran Tree Strategy [APP-323].**<br><br>New green infrastructure will be created in the environmental areas that National Grid proposes to create around the substations and other permanent infrastructure required to deliver the Project. These newly created habitats have been designed to deliver BNG and to link with existing blue and green infrastructure outside within and outside the Order Limits. As set out in the BNG report, the design of these habitats as been aligned with the draft LNRSs.<br><br>Elsewhere the Project's impacts to habitats will be temporary with habitats reinstated to the baseline habitat type and condition. As set out in the BNG report hedgerows and watercourses are to be enhanced by one condition level to deliver BNG i.e., they are to be restored to a better condition than they were in at baseline. This habitat reinstatement and enhancement will ensure that connectivity of natural habitats is maintained across the landscape.<br><br>The Project reviewed and considered the draft LNRSs as outlined in the BNG Report as the final reports had not been published when the report was produced. National Grid will consider projects that align with the LNRSs in the three counties that the Project is located within. It is seeking to purchase units that provide wider societal benefits and deliver Environmental Net Gain. It is likely that this will |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| | | include projects that support the Essex Green Infrastructure Strategy. The Project is aware of several nature recovery projects that interact with its alignment and have sought to minimise the potential for negative effects. The Project design allows for future plans for nature recovery so that river restoration projects for example will be able to proceed without adverse effects to the Project or nature.<br><br>Habitats that are temporarily removed by the Project will either be replaced with new planting or allowed to regenerate naturally. Replacement planting will be used in most areas where it is necessary to break ground as the vegetation will have been removed. Natural regeneration will be used in: areas of valuable grassland habitat where the seed bank is to be preserved. where vegetation needs to be cut back to facilitate installation of the 400 kV overhead line and it associated electrical clearances. where third party works are to be placed underground with above ground cables and structures removed, in this case the vegetation that has been managed by third party statutory undertakers beneath the cables will be released from regular management and poles/other structures may be removed.<br><br>Newly created habitats that are located within areas that are owned by National Grid, for example the substations, will be subject to management plans to deliver BNG and managed by National Grid. The restored/ replace/enhanced habitats that are not owned by National Grid will be returned to the landowner and management will continue as before. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| | | Where electrical clearance needs to be maintained tall vegetation (trees) would need to be pruned but habitat connectivity will be maintained albeit at a reduced height in the areas where woodland is within this area. Only trees would be affected by electrical clearances all other habitats would be able to fully develop with their ecological function maintained. As set out in **7.4 Outline Landscape and Ecological Management Plan [AS-046]**, as a mitigation measure the Project will provide dormouse boxes in areas where hazel dormouse has been confirmed to be present, bat boxes in areas where bat roosts are confirmed and bird boxes where replacement features are required. Fencing is to be used during construction and for security reasons around permanent infrastructure. During construction, this fencing will be permeable to wildlife where there is no risk of harm. For example, wildlife will be able to cross most areas of the construction site. Fencing that is not permeable to wildlife will be used for the safety of animals. For example, impermeable fencing will be installed around active compounds where materials are to be stored. This fencing will not be permeable to animals to avoid the risk of harm. Other measures required to safeguard flora and fauna are set out in **7.2 Outline Code of Construction Practice [APP-300].** As set out in **7.4 Outline Landscape and Ecological Management Plan [AS-046**] brash and timber material generated by site clearance are to be used to create wildlife habitat in areas of retained vegetation. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| **New Strategic Policy PPL4a: Biodiversity Net Gain in Tendring** | Alongside the requirements in relation to Biodiversity and Geodiversity set out in Policy PPL4, development in Tendring will be subject to the legal and national requirements for 'Biodiversity Net Gain' (BNG). Development proposals that qualify for BNG will be expected to deliver a minimum 20% increase in biodiversity value relative to the predevelopment biodiversity of onsite habitat within the development site to meet the biodiversity objective in line with the national minimum requirement.<br>The method by which developers are required to calculate the existing biodiversity value of a site and thereafter calculate and deliver BNG are set out in full within national guidance.<br>In line with the Biodiversity Gain Hierarchy as set out in legislation and national guidance, the Council will expect as much of the necessary BNG as possible to be delivered on-site (within the red line boundary of a development site), through measures that will be secured through legal agreement and/or planning condition.<br>Any residual BNG requirement that cannot be met on-site can be delivered offsite either on land in the control of the developer/landowner outside of the development site (to be tied into a legal agreement and registered), or by the purchase of offsite biodiversity units from a registered site. In both cases the offsite BNG must be allocated to the development, and the Council would need to be provided with official certification of registration of that allocation to the development. | Despite BNG not yet being a mandatory requirement for Nationally Significant Infrastructure Projects (NSIPs), National Grid has committed to deliver at least a 10% Environmental Net Gain on all construction projects. This includes delivering BNG and, for this Project, National Grid has set a voluntary target of a minimum 10% BNG.<br>The Project will achieve a minimum of 10% Biodiversity Net Gain (BNG) (through on-site and off-site BNG) and has undertaken a BNG assessment (based on Natural England's Statutory Biodiversity Metric 2024 version (as of June 2025)) which is presented in the **Biodiversity Net Gain Report [APP-299].**<br>National Grid's approach is to provide any on-site BNG in a coordinated manner in locations that do not prejudice the siting or routeing of future electricity infrastructure, such as substation extensions or customer connections. This approach is in the best interests of nature and is economical and efficient because it safeguards on-site BNG and means that on-site landscape screening or other environmental mitigation can also contribute towards BNG.<br>Essex Wildlife Trust and National Grid are in discussion with regard to the potential to assist with the requirement of approximately 400 units in Essex, which include other neutral grassland, mixed scrub, individual trees and acid grassland. National Grid will continue to work with Essex Wildlife Trust to identify potential sites as the Project progresses.<br>'Environmental Areas' have been identified across the Project as part of on-site mitigation. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | If developers cannot achieve on-site or off-site BNG, they must buy statutory biodiversity credits from the government as a last resort. The government may then use the revenue to invest in habitat creation anywhere in England.<br>To enable off-site BNG provision to be delivered in a coordinated way that brings about the creation of bigger, better and more connected habitats that are resilient, manageable and contribute effectively to the aims and objectives of the Essex Local Nature Recovery Strategy; the Council will support the setting up of 'Habitat Banks' in the District from which biodiversity units can be bought – so long as:<br>i. the applicant has the legal right to sell biodiversity units for the purpose of mandatory BNG;<br>~~*iv.*~~ ii. the habitat creation/enhancement proposals are appropriate and likely to succeed;<br>~~*v.*~~ iii. the uplift in biodiversity units is genuinely additional (i.e. there is no double-counting with conservation schemes in place or funded by other means):<br>~~*vi.*~~ iv. the applicant enters into a legal agreement with the Council or a conservation covenant with a responsible body, detailing the arrangements for provision, management, monitoring, remediation and enforcement;<br>~~*vii.*~~ v. the location would not prejudice either the integrity of existing habits or the planned growth of the District proposed in the Local Plan; and | Multifunctional areas were prioritised providing mitigation or enhancements for different environmental aspects, i.e. sites where landscape mitigation and biodiversity gains could be achieved together. National Grid would retain ownership of these Environmental Areas and therefore National Grid can commit to a 30-year habitat management and monitoring plan. Land around the EACN Substation has been identified as 'Environmental Areas' and presented in the **Outline Landscape and Ecological Management Plan (LEMP) [AS-046]**.<br>National Grid's commitment to providing 10% BNG will be secured through a unilateral undertaking given under s.106 of the Town and Country Planning Act 1990. While every effort has been made to deliver the required biodiversity units on-site through replacement planting and on-site mitigation in the form of habitat creation and enhancement, given the scale and nature of the Project, this 10 % net gain is not fully achievable on-site. Off-site biodiversity units are therefore proposed to make up this deficit.<br>Biodiversity is not bound by Local Authority area and therefore off-site Biodiversity Net Gain (BNG) will be considered across the length of the Project. However as detailed within the **7.1 Biodiversity Net Gain Report [APP-299]**, the aim is to deliver a biodiversity legacy ideally in each of the three Counties crossed by the Project (Norfolk, Suffolk and Essex). Off-site BNG sites will be selected based on a range of factors including proximity to the Project, geographical location, local nature recovery |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | ~~viii.~~ vi. the site meets the criteria for registration and is subsequently registered on the biodiversity gain site register.<br><br>The Council will give particular support to the establishment of Habitat Banks in the following locations:<br>a) on land adjoining existing sites designated for their international, national or local importance that will bring about expansion of and/or connectivity between those habitats;<br>~~f)~~b) on land within the District's 'Strategic Green Gaps' (see Policy PPL6);<br>~~g)~~c) on land at or adjoining the District's Registered Parks and Gardens, Local Green Spaces and safeguarded open spaces; and<br>~~h)~~d) sites within locations identified in the Essex Local Nature Recovery Strategy as strategic opportunities for habitat creation.<br>To formalise these Habitat Banks, they need to be officially registered with Natural England which would first require landowners to either enter into a legal agreement with the Council (that, amongst other things, will define the nature of proposed habitat creation and put in place long-term arrangements for management and monitoring); or enter into a 'conservation covenant' with another responsible body recognised by Natural England.<br>Any legal agreements or covenants required either to discharge the BNG requirements for individual planning permissions or to establish Habitat Banks where the Council is the responsible for monitoring | strategies, habitat type, habitat condition, cost and timings amongst others. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | and enforcement will include the provision for the payment of monitoring fees which will be used by the Council, or a nominated body, to cover the cost of monitoring BNG over a minimum 30- year period, in line with legislative requirements. | |
| **New Non-Strategic Policy PPL9a:**<br>**Non-Designated Heritage Assets** | The Council will seek to ensure the retention, enhancement, and viable use of heritage assets of local importance, including those present on the Council's emerging Local Heritage List. Permission for a proposal that would result in harm to, or the loss of, a non-designated heritage asset will only be granted provided that a balanced judgement has been made that takes into account the scale of harm to, or loss of significance of the non-designated asset.<br>The Council will apply this balanced judgement when also assessing proposals which affect the form, character, or setting of the 'Protected Lanes', as defined on the Policies Map. | **ES Chapter 11: Historic Environment [AS-068]** reports the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets.<br>The **Historic Environment Baseline Report [APP-209]** and **Figure 11.3: Non- Designated Heritage Assets Assessed in the ES Chapter [APP-218]** identify the non-designated assets of prehistoric through to modern date recorded in the respective Historic Environment Record (HER) or identified through other desk-based sources or through fieldwork, within the Project Order Limits and 250 m Study Area.<br>During construction, the Project is predicted to have a residual significant effect on non-designated assets, including a medium value cropmark complex east of Ardleigh (3233), due to changes in their setting that affect their values or due to physical impacts during |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | the construction phase of the Project. As presented previously the level of harm is justified by the substantial public benefits and need for the Project, as set out in **Chapter 5 of the Planning Statement [APP-085]**.<br>With regard to Protected Lanes, the Project oversails Wick Lane. The Project has sought to avoid works at Protected Lanes where practicable.<br>The above routes would be oversailed by the Project requiring the removal of trees and vegetation. Vegetation would be replanted; although trees would not be replanted under overhead lines, low growing scrub and hedgerows would be established.<br>**ES Chapter 13: Landscape and Visual [APP-226], ES Appendix 13.2: Landscape Baseline and Assessment [APP-228], ES Appendix 13.3: Visual Baseline and Assessment (APP-229 to APP-232) and ES Appendix 13.4: Residential Visual Amenity Assessment (APP-233 to APP-234)** provide an assessment of the landscape and visual impacts on Protected Lanes. |
| **New Strategic Policy PPL10b: Embodied Carbon and Circular Economy in Homes and Buildings** | All development proposals must demonstrate the measures taken to minimise embodied carbon (subject to meeting Policy PPL11 requirements first) and how circular economy principles have been embedded into the design. In doing so:<br>1) Re-using, renovating or retrofitting existing buildings and/or structures should be prioritised. Any demolition must be justified to the satisfaction of the Local Planning Authority. | As presented in **ES Appendix 4.1: Greenhouse Gas Assessment [APP-308]** the total CO2e estimated on the Project is 376,214 tCO2e. This is split into 333,4617 tCO2e for capital (construction) carbon (which would be spread over the whole construction duration), 39,199 tCO2e for transmission losses during 40 years of operation and 3,398 tCO2e for Non SF6 loss through leakage.<br>National Grid follows the principles of PAS 2080: 2023 Carbon Management in Infrastructure and Built Environment, throughout the project development |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | 2) Proposals for all new residential and non-residential buildings, and also proposals for extensions, renovations and conversions of existing buildings, must demonstrate that upfront embodied carbon* has been considered and reduced as far as possible through lean design, sustainable material procurement and waste minimisation.<br>3) Proposals for major residential and non-residential development are required to achieve the following set limits for upfront embodied carbon. This must be demonstrated through an embodied carbon assessment using a RICS and/or nationally recognised methodology which should be submitted at the same time as the full or reserved matters planning application (and with the outline planning application for residential schemes of 100 dwellings or more, and non-residential schemes of 5000m2 or more):<br>a) Low rise residential (up to 11m): ≤500 kgCO2e/m2 (GIA**) or subsequent update;<br>b) Mid and high rise residential (over 11m): ≤500 kgCO2e/m2 (GIA) or follow NZCBS*** limits when available;<br>c) Non-residential buildings: offices ≤600 kgCO2e/m2 (GIA); education ≤500 kgCO2e/m2 (GIA); and retail ≤550 kgCO2e/m2 (GIA); or follow NZCBS limits when available; and; d. For building services, meet the global warming potential refrigerant limits set out in NZCBS.<br>* Upfront Embodied Carbon = emissions associated with the Building Life Cycle Stages A1-A5 and RIBA | process and require this of its contractors. PAS 2080 is a global standard for managing infrastructure carbon. This framework looks at the whole value chain, aiming to reduce carbon and reduce cost through more intelligent design, construction and use. Design optimisation in line with the carbon reduction hierarchy is included below:<br>• Reduce the elements and materials required for the construction phase of the Project<br>• Use alternative raw materials and resources, such as those with a higher proportion of recycled content<br>• Use efficient construction processes, such as manufacture and assembly design.<br>The Project makes a significant contribution to Net Zero by providing significant reinforcements to the transmission system which will facilitate the connection of future sources of renewable and low carbon power generation along the coast and therefore will facilitate the achievement of Net Zero |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | stages 2/3, 4 and 6) **GIA = Gross internal floor area ***NZCBS = UK Net Zero Carbon Building Standards (pilot launched September 2024). | |
| **Strategic Policy CP1: Sustainable Transport and Active Travel** | Proposals for new development must be sustainable in terms of transport and accessibility and therefore should include and encourage opportunities for access to sustainable modes of transport, including walking, cycling and public transport. Providing options for non-motorised vehicles is especially important for the largescale developments at Clacton and the Tendring Colchester Borders Garden Community.<br>Planning applications for new major development likely to have significant transport implications will normally require a vision-led Transport Statement or, where appropriate, a Transport Assessment, the scope of which should be agreed in advance between the District Council and the applicant, in consultation with Essex County Council as the Highway Authority.<br>To reduce dependence upon private car transport, improve the quality of life for local residents, facilitate business and improve the experience for visitors, all such applications should:<br>• include proposals for safe, direct and attractive walking and cycling routes that link to existing networks and are not impeded by infrastructure provided for other forms of transport;<br>• ensure enhanced connectivity to existing public rights of way, including footpaths and bridleways, and where possible create new links that improve | **Appendix B Outline Construction Worker Travel Plan of the Outline CTMP [APP-311]** contains the, setting out the good practice measures that will be in place to encourage sustainable transportation for the workforce, in a way that reduces both environmental and social impacts on the local area. The objective of the Outline Construction Worker Travel Plan is to encourage a reduction in the quantity of single-occupancy car journeys and to create a shift towards more sustainable modes of transport.<br>The **Outline PRoW Management Plan [APP-329]** provides a list of each of the affected PRoWs and the proposed management proposals. The Project is not expected to result in any permanent closures or diversions of footways or the cycle network as a result of the construction activities of the Project. A limited number of temporary diversions and crossing points are required for PRoW affected by the construction of the Project. The **Outline Public Rights of Way (PRoW) Management Plan [APP-329]** explains the details of the temporary short-term diversions and appropriate measures for the management of PRoW during the various stages of the Project.<br>The assessment in **ES Chapter 6.16 Traffic and Transport [APP-271]** concluded that a short term neutral or minor adverse effect is expected on all PRoW from pedestrians, cyclists and horse-rider delays, and overall these are therefore expected to |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | access to the wider countryside and green infrastructure network with particular emphasis on connections to the Sunshine Coast Greenway;<br>• provide good walking and cycling connections to public transport nodes and interchanges, ensuring integration between modes;<br>• demonstrate greater connectivity between places and modes of transport, including improvements to railway station passenger facilities where relevant;<br>• incorporate measures consistent with the Tendring District Cycling Action Plan and the Essex Walking Strategy 2021 and the Sunshine Coast Greenway objectives, ensuring alignment with local and countylevel priorities for active travel; and<br>• recognise the health benefits of active travel, supporting the objectives of Policy HP1: Healthy Places, by creating environments that encourage physical activity and reduce car dependency.<br>Travel Plans and Residential Travel Information Packs should be provided as appropriate and in accordance with Essex County Council published guidance.<br>The Essex Design Guide Parking Standards, and Essex Cycling Strategy, and relevant local strategies will be used to ensure the provision of appropriate cycling and walking infrastructure. | be not significant. The assessment also concludes that with mitigation measures, no significant adverse effects on sensitive receptors including PRoW, and on the use and safety of the road network, are anticipated during construction.<br>Details of the strategy for PRoWs and the management regimes can be found within the **PRoW Management Plan [APP-329].**<br>From a transport and highways perspective, due to the nature of the Project and the requirement for a rural location, links to sustainable means of transport are difficult to achieve. During construction efforts will be made to encourage the use of sustainable transport modes for construction workers. **Appendix B Outline Construction Worker Travel Plan of the Outline CTMP [APP-311]** contains the Travel Plan, setting out the good practice measures that will be in place to encourage sustainable transportation for the workforce, in a way that reduces both environmental and social impacts on the local area. The objective of the Travel Plan is to encourage a reduction in the quantity of single-occupancy car journeys and to create a shift towards more sustainable modes of transport. |
| **Chelmsford City Council Local Plan Review (Pre-submission Regulation 19) (Draft Plan February 2025)** | | |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| **Strategic Policy S1 – Spatial Principles** | The Council will require all new development to accord with the following Spatial Principles where relevant:<br>• Locate development to avoid or manage flood risk and reduce carbon emissions<br>• Protect the Green Belt from **inappropriate development**<br>• Respect the character and appearance of landscapes and the built environment, and preserve or enhance the historic and natural environment and biodiversity… | The spatial principles set out in this policy aim to provide guidance to a range of developments; however, only the principles included in the policy text are considered relevant to the Project.<br>The Project has sought to avoid and manage flood risk. **ES Chapter 12: Hydrology and Land Drainage [APP-221]** concludes that the Project has sought to avoid siting any infrastructure in areas at risk of flooding. The majority of the permanent Project infrastructure would be located outside of the areas shown to be at 'high' risk of surface water flooding in the Environment Agency Surface Water Map. Of the places where the Project would interact with the high-risk zone for operation, the majority of these would be access roads. Surface water runoff from construction sites, haul roads and operational assets would be managed using SuDS techniques appropriate to local conditions (see Appendix C of the **FRA [APP-331]**) and through standard mitigation measures set out in the **Outline CoCP [APP-300]**.<br>With respect to carbon emissions **ES Appendix 4.1: Greenhouse Gas Assessment [APP-308]** the total CO2e estimated on the Project is 376,214 tCO2e. This is split into 333,4617 tCO2e for capital (construction) carbon (which would be spread over the whole construction duration), 39,199 tCO2e for transmission losses during 40 years of operation and 3,398 tCO2e for Non SF6 loss through leakage.<br>National Grid follows the principles of PAS 2080: 2023 Carbon Management in Infrastructure and Built Environment, throughout the project development process and require this of its contractors. PAS 2080 |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | is a global standard for managing infrastructure carbon. This framework looks at the whole value chain, aiming to reduce carbon and reduce cost through more intelligent design, construction and use. Design optimisation in line with the carbon reduction hierarchy is included below:<br>• Reduce the elements and materials required for the construction phase of the Project<br>• Use alternative raw materials and resources, such as those with a higher proportion of recycled content<br>• Use efficient construction processes, such as manufacture and assembly design.<br>The Project makes a significant contribution to Net Zero by providing significant reinforcements to the transmission system which will facilitate the connection of future sources of renewable and low carbon power generation along the coast and therefore will facilitate the achievement of Net Zero<br>With regard to the Green Belt the Project is routed through the Metropolitan Green Belt between Chelmsford and the new Tilbury North Substation in Thurrock. An assessment on the Green Belt can be found in the **Planning Statement [APP-085].** The assessment in the Planning Statement concludes that the overhead line infrastructure should be considered to be an engineering operation and as such should not be regarded as inappropriate development in the Green Belt provided that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. Notwithstanding the above, even if the overhead lines were |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | considered to be inappropriate development (which is not accepted by the Applicant as set out in **5.6 Planning Statement [APP-085]** ), it is nevertheless considered that there are very special circumstances which justify their acceptability. Paragraphs 7.3.497 to 7.3.537 of the **5.6 Planning Statement [APP-085]** consider the Project's compliance with Green Belt policy. The assessment concludes that the overhead line infrastructure should be considered to be an engineering operation and as such should not be regarded as inappropriate development in the Green Belt.<br><br>The **5.6 Planning Statement [APP-085]** details the Very Special Circumstances applicable in this instance to justify inappropriate development. In addition, paragraph 4.2.17 of National Policy Statement EN-1[3] also confirms that '*…the Secretary of State will take as a starting point that critical national priority infrastructure will meet the following, non-exhaustive, list of tests:*<br><br>• Where development within a Green Belt requires very special circumstances to justify development'.<br><br>National Grid has embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project.<br><br>The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the |

[3] Department for Energy Security and Net Zero (2024) *Overarching National Policy Statement for Energy (EN-1)*

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | first instance, avoid or reduce adverse environmental impacts through the process of design development, and by embedding measures into the design of the Project. The **Planning Statement [APP-085]** explains how good design has been embedded in the project from the outset. The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles.<br>**ES Chapter 13 Landscape and Visual [APP-226]** identifies embedded measures relevant to Landscape and Visual including:<br>• Sensitive routeing and siting of the alignment and Order Limits<br>• Prior to the commencement of construction works for the Project, several existing overhead and underground third-party services would need to be diverted, removed, undergrounded, or protected<br>• Replacement planting would be undertaken at the earliest opportunity given the right planting season, to mitigate, where practicable, vegetation removed during construction.<br>With regards to preserving the historic environment, **ES Chapter 11 Historic Environment [AS-068]** reports the assessment of the likely significant historic environment effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. ES Chapter 11 concludes that the Project would not result in substantial harm to any heritage assets. Within Chelmsford, the Project would result in a permanent significant effect (considered to constitute less than substantial harm) to three listed buildings and The Langleys Registered Park and Garden. |
| **Strategic Policy S2 – Addressing Climate Change and Flood Risk** | The Council, through its planning policies and proposals that shape future development, will seek to mitigate and adapt to climate change. In addressing the move to a net zero carbon future for Chelmsford, the Council will seek new development that:<br>• Reduces greenhouse gas emissions<br>• Results in net zero carbon emissions and exceeds Building Regulations Parts F and L in accordance with Policy DM31<br>• Promotes the efficient use of natural resources including use of integrated water management techniques<br>• Reduces the need to travel and provides for active and sustainable transport modes<br>• Encourages design and construction techniques which contribute to climate change mitigation and adaptation<br>• Provides opportunities for renewable and low carbon energy technologies and schemes | The Project is a vital part of the transition to net zero and is CNP infrastructure. Due to the growth in offshore wind generation, there has been a significant number of connections planned in the East Anglian and south-east coastal areas of England. As such, the network requires significant reinforcement to provide the connections for more offshore wind on the east coast.<br>A **Greenhouse Gas Assessment [APP-131]** has been prepared in support of the Project. This identifies the carbon dioxide equivalent emissions that would be released during the construction and operation of the Project. The assessment concludes that the construction and operational $CO_2e$ numbers are not considered to have a material impact on the ability of the Government to meet its carbon reduction targets and are therefore not significant. Therefore, the operational, medium to long term benefits of delivering the Project on a national level are considered to outweigh any short-term impacts of |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | • Provides opportunities for decentralised energy and heating systems<br>• Minimises impact on flooding and over-heating<br>• Protects and provides opportunities for well-connected multifunctional green and blue infrastructure including city greening, woodland creation, tree planting, and new habitat creation<br>• Assists the delivery of Biodiversity Net Gain that will deliver mitigation and adaptation benefits.<br>The Council will require that all development is safe, taking into account the expected life span of the development, from all types of flooding and appropriate mitigation measures are identified, secured and implemented. New development should not worsen flood risk elsewhere. | greenhouse gas (GHG) emissions because of material use and construction activities.<br>Water efficiency is considered in the **Outline CoCP [APP-300].** Commitment W16 sets out the water supply and efficiency commitments which will be adopted during construction.<br>The Project has sought to reduce the need for construction staff to travel using a private car. The Project has sought to reduce through-traffic in town centres by requiring construction staff to travel via defined Primary Access Routes for construction staff travelling to dedicated construction areas as set out in the **Outline CTMP [APP-309]**. These routes have sought to avoid town centres. Further measures will be adopted during construction to encourage all staff to move away from reliance on single occupancy private car travel; these are set out in Section 5 of the Outline CTMP.<br>Within Chelmsford, pylon TB140 is positioned within Flood Zone 3. The Project is designed such that permanent works are resilient to flooding, ensuring the Project would be safe and could continue to operate during a flood event.<br>The Project will utilise design techniques which contribute to climate change mitigation such as SuDS. Of the places where the Project would interact with the high-risk flood zone for operation, the majority of these would be access roads. Surface water runoff from construction sites, haul roads and operational assets would be managed using SuDS techniques appropriate to local conditions (see Appendix C of the **FRA [APP-331]**) and through |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | standard mitigation measures set out in the **Outline CoCP [APP-300].**<br>With regard to how the Project will minimise impact on flooding, see response to Strategic Policy S1 – Spatial Principles above.<br>The Project provides opportunity for green infrastructure by providing mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain (BNG) with wider environmental and societal benefits. Although there is currently no legislative requirement for BNG in respect of infrastructure projects for which development consent is required, the Project would deliver an overall net improvement in environmental value (including biodiversity) through a combination of on-site and off-site mitigation. This is reported in the **Biodiversity Net Gain Report [APP-299].** |
| **Strategic Policy S3 – Conserving and Enhancing the Historic Environment** | The Council will conserve and where appropriate enhance the historic environment recognising the positive contribution it makes to the character and distinctiveness of Chelmsford through the diversity and quality of heritage assets. This includes wider social, cultural, economic and environmental benefits.<br>The Council will designate and keep under review Conservation Areas in order to preserve or enhance their special architectural or historic interest with an emphasis on retaining and where appropriate improving the buildings and/or features that make a | National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. **ES Chapter 3: Alternatives [APP-127]** documents the key environmental factors that were considered in the optioneering and design evolution process. Good design of electricity transmission infrastructure is |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | positive contribution to their character or appearance.<br>The Council will conserve or enhance the significance (including any contribution made by its setting) of Listed Buildings, Scheduled Monuments and Registered Parks and Gardens with an emphasis on preserving and where appropriate enriching the social, cultural, economic and environmental benefits that these heritage assets provide.<br>The Council will seek the protection, conservation, and where appropriate and important to their significance, re-use and/or enhancement of historic places and sites on the Heritage at Risk Register and the local buildings at risk register.<br>When assessing applications for development, the Council will place great weight on the preservation or enhancement of designated heritage assets and their setting. The Council will encourage applicants to put heritage assets to viable and appropriate use, to secure their future preservation and where appropriate enhancement, as appropriate to their significance. Policy DM13 sets out how the Council will consider proposals affecting the different types of designated heritage assets and their significance.<br>The Council will seek to conserve and where appropriate enhance the significance of non-designated heritage assets and their settings, which includes buildings, structures, features, gardens of local interest and protected lanes. Policy DM14 sets out the Council's approach to the protection and retention of these assets. | primarily governed by application of the Holford and Horlock Rules, alongside an iterative design approach informed by stakeholder engagement, relevant sections of national policy (NPS EN-1 and EN-5) and the embedded environmental design mitigation as part of the Environmental Impact Assessment process.<br>Such good design principles are then intertwined with the technical design requirements alongside the regulatory and other constraints such as operational, safety and security requirements for new electricity transmission infrastructure.<br>The **Design Development Report [APP-122], Design and Access Statement [APP-353] and Design Approach for Site Specific infrastructure [APP-354]** summarise the different choices made during the design process.<br>**ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets [APP-215]** found that the Project would not result in substantial harm to any heritage assets. **ES Chapter 11: Historic Environment [AS-068]** concludes that within Chelmsford, the Project would result in adverse impacts to four designated assets including a registered park and garden, and three non-designated heritage assets.<br>The substantial public benefits and need for the Project, as set out in **Chapter 5 of the Planning Statement [APP-085],** including supporting the UK's net zero target, enabling the connection in East Anglia of new low carbon energy generation, and reinforcing the transmission network, clearly and |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | Chelmsford contains a number of sites of archaeological importance. As set out in Policy DM15, the Council will seek the preservation and where appropriate enhancement of sites and their setting of archaeological interest. | demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage assets of scheduled quality. Whilst the Project would not result in substantial harm to designated heritage assets, it would result in the loss of significance to heritage assets due to the introduction of temporary and/or permanent plant, machinery and infrastructure into the setting. This loss of significance is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024a) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which require a clear outweighing of harm, exceptionality or very special circumstances.<br><br>The local planning authority has raised concerns that non-designated heritage assets have not been adequately considered in the assessment work to date. It is considered that the assessment methodology has been agreed, with the exception of non-designated heritage assets, where the method is still under discussion. See the **Draft Statement of Common Ground with Chelmsford City Council [APP-098].**<br><br>Within Chelmsford there are a number of Protected Lanes in proximity to the Project. The Project has sought to avoid works at Protected Lanes where practicable. However, during construction, works will be required at:<br><br>• • Cole Hill |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | • • Paulke Hall Road<br>• • Goodmans Lane<br>• • Lark's Lane.<br>The above routes would be over sailed by the Project and have temporary bellmouths installed or potentially existing accesses widened to allow access for construction vehicles. Other Protected Lanes may experience temporary increases in traffic flow.<br>Impacts to Protected Lanes during the operational phase have been discounted from consideration, given that National Grid has committed to restoring landscape features requiring removal during construction where feasible. For instance, historic hedgerows will be restored, as will historic earthworks contributing to the Protected Lane. There will also be no material increase in traffic using the Protected Lanes during the operational phase. Vegetation, earthworks (such as banks or ditches) and other boundary features (such as walls or fencing) that border Protected Lanes, as designated by Local Authorities, will be reinstated as close to their pre-construction condition as possible as set out in the commitments of the **Outline CoCP [APP-300]**. Pre-construction photographs will be taken to ensure a record is available to inform any reinstatement.<br>**ES Chapter 13: Landscape and Visual [APP-226], ES Appendix 13.2: Landscape Baseline and Assessment [APP-228], ES Appendix 13.3: Visual Baseline and Assessment [APP-229 to APP-232] and ES Appendix 13.4: Residential Visual Amenity Assessment [APP-233 to APP-234]** |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | provide an assessment of the landscape and visual impacts on Protected Lanes. |
| **Strategic Policy S4 – Conserving and Enhancing the Natural Environment** | "The Council is committed to the conservation and enhancement of the natural environment through the protection of designated sites and species, whilst planning positively for biodiversity networks and minimising pollution. All projects should have regard to reducing the impacts of climate change and respond to the ecological emergency, delivering multiple benefits in terms of but not exclusive to habitats, carbon storage and Natural Flood Management.<br>The Council will plan for a well-connected multifunctional network of green and blue infrastructure which protects, enhances and, where possible, restores ecosystems, securing a net gain in biodiversity and allows nature recovery across the Council's area. The garden community developments will be required to deliver 20% Biodiversity Net Gain, other qualifying new development will be required to deliver a minimum 10% Biodiversity Net Gain. The needs and potential of biodiversity will be considered together with those of natural, historic and farming landscapes, the promotion of health and wellbeing, sustainable travel, water management including water resources, and climate change adaptation.<br>The Council will ensure that new development does not contribute to water pollution and, where possible, enhances water quality, and demonstrates the advancement of biodiversity and amenity interests through the provision of a range of greenspaces. | The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project.<br>The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, during the construction and operation (including maintenance) phases. In addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) through a combination of on-site and off-site mitigation/enhancement. This is reported in the **Biodiversity Net Gain Report [APP-299]**. There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required.<br>In relation to water quality **ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]** details the likely significant effects of the Project |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | Management, mitigation and compensation measures will be secured through planning conditions/obligations where necessary. Developers will need to demonstrate that sufficient waste water treatment capacity is available ahead of occupation to ensure no deterioration in the quality of receiving waters.<br>The Council will ensure that, where appropriate, new development seeks to improve water-related biodiversity taking account of Water Framework Directive objectives and River Basin Management Plan actions.<br>The Council will ensure that new development maximises opportunities for the preservation, restoration, enhancement, and connection of natural habitats in accordance with the Local Nature Recovery Strategy or future replacements.<br>The Council will seek to minimise the loss of the best and most versatile agricultural land (Grades 1, 2 and 3a) to major new development. | on the water environment with respect to surface water discharges and water pollution. The baseline of the water environment is characterised in this chapter. The assessment has been informed by a **WFD Assessment [APP-332]**. The assessment presents the existing consented discharges to surface water that have been obtained from the Environment Agency (January 2024).<br>During construction, temporary watercourse crossings and associated activities may lead to changes in flow regimes, hydromorphology, and pollution risks, such as runoff and drilling fluid releases. Standard practice measures outlined in the **Outline CoCP [APP-300]** mitigate these risks, reducing impacts on water quality and hydromorphology to negligible or minor adverse levels, which are not significant. For trenchless crossings, measures like drilling fluid breakout management plans minimise disturbance to sensitive watercourses, such as the River Stour. Overall, potential impacts on designated nature conservation sites and groundwater are assessed as negligible and not significant, with safeguards ensuring minimal environmental disruption.<br>Discussions would be held with the Environment Agency in relation to any required consents and permits necessary for the works, in accordance with commitment W01 in the **Outline CoCP [APP-300].** The works would subsequently be carried out in accordance with the requirements of these consents, thereby safeguarding water environment receptors. Water pollution from permanent drainage will be |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | avoided by timed inspections and maintenance by the Applicant, as required to safeguard surface and groundwater quality.<br>Effects on watercourses, their water quality and hydromorphology, and effects on existing surface water interests (abstractions and discharges) are scoped out for operation (and maintenance) in accordance with the **EIA Scoping Opinion [APP-297].**<br>**ES Chapter 6: Agriculture and Soils [APP-138]** assesses the potential residual effects of the Project on agricultural land use within the Order Limits. The potential presence of BMV land has been assessed through reference to published information and surveys of the areas permanently affected. The assessment sets out the total area of each land grade permanently affected and estimates the likely area of land at each grade. In Chelmsford, there are 29,280 hectares of BMV land, (85.5% of agricultural land in the Borough). During construction and operation (including maintenance) there would be a loss of BMV land (ALC Grades 1, 2 and 3a) from agricultural productivity.<br>The Project minimises impacts on BMV agricultural land as far as practicable and includes mitigation measures to reduce impacts on the soil resource. The permanent loss of BMV land is considered necessary on the basis that there is urgent need for CNP infrastructure such as the Project. The routeing and siting selection process confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Project. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | The Applicant recognises that uncertainty while the Project is developed may cause anxiety. The Applicant has sought to reduce potential effects on communities and residents through routeing and design. The Applicant has also sought to reduce concern or uncertainty about the Project through engaging with residents and stakeholders throughout the development of the Project. The Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including letters, phone calls and meetings. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns.<br>No sterilising effects on land use within Chelmsford is anticipated as a result of the Project. Unless land has been otherwise identified for mitigation areas, landowners will still be able to farm beneath the overhead lines and above the underground cable. No likely significant effects on agricultural operations and viability are anticipated during operation. |
| **Strategic Policy S9 – Infrastructure Requirements** | "Flood Risk Management<br>New development must be safe from all types of flooding and suitablenot make flood risk worse elsewhere. Suitable strategic and site level measures will need to provide appropriate flood risk management. These include but are not limited to:<br>• Strategic flood defence measures on the Rivers Chelmer, Can and Wid to protect ~~existing development in~~ Chelmsford City Centre | From a transport and highways perspective, due to the nature of the Project and the requirement for a rural location, links to sustainable means of transport are difficult to achieve. During construction efforts will be made to encourage the use of sustainable transport modes for construction workers. **Appendix B Outline Construction Worker Travel Plan of the Outline CTMP [APP-311]** contains the Travel Plan, setting out the good practice measures that will be in place to encourage sustainable transportation for the |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | • Local flood mitigation measures within or as part of development sites including the use of SuDS.<br>• Provision of new lock and replacement of weir gates at Chelmer Waterside<br>Green Infrastructure and Natural Environment<br>Infrastructure necessary to support new development must provide or contribute towards ensuring a range of multifunctional green, blue, and natural infrastructure, nature recovery, net gain in biodiversity and public realm improvements. These include but are not limited to:<br>• Provision of a wide range of open space within development sites to meet amenity, recreational and functional needs<br>• ~~To contribute towards~~ Provision of a multifunctional network of green and blue infrastructure and to enhance biodiversity<br>• Provision of areas for nature recovery<br>• Provision of new public realm and enhancements at key centres of activity<br>• Contributions towards recreation disturbance avoidance and mitigation measures for European designated sites as identified in the Essex Recreational disturbance Avoidance and Mitigation Strategy.<br>• Contributions towards addressing cumulative recreational pressure on SSSIs.<br>Historic Environment<br>Infrastructure necessary to support new development must seek to preserve or enhance the historic | workforce, in a way that reduces both environmental and social impacts on the local area. The objective of the Travel Plan is to encourage a reduction in the quantity of single-occupancy car journeys and to create a shift towards more sustainable modes of transport.<br>In relation to flood risk, **ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]** sets out how the Project has sought to minimise impact on flooding. The majority of the Project lies within Flood Zone 1 and in zones that are at low risk of flooding from other sources. Due to its linear nature and the geographical extent of the Project, some components, namely pylons, must necessarily be located in areas with a medium and high risk of flooding (Flood Zones 2 and 3). The permanent Project works which lie within Flood Zone 3 are restricted to a small number of pylons for the overhead lines. These are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement.<br>The **Outline CoCP [APP-300]** describes the good practice measures, including SuDS, for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime. The **FRA [APP-331]** states that access roads and haul roads, as well as areas where impermeable material will be installed in areas where heavy |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | environment and mitigate any adverse impacts on nearby heritage assets and their settings”..” | equipment would be used, will also have suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff.<br>With regards to the natural environment, the Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats during the construction and operation (including maintenance) phases.<br>In addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) through a combination of on-site and off-site mitigation. This is reported in the **Biodiversity Net Gain Report [APP-299].** There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required.<br>**ES Chapter 11: Historic Environment [AS-068]** reports the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets.<br>ES Chapter 11 concludes that the Project would not result in substantial harm to any heritage assets. Within Chelmsford the Project would result in less than substantial harm to a number of designated and non-designated heritage assets, and a scheduled monument. The substantial public benefits and need for the Project, as set out in Chapter 5 of the **Planning Statement [APP-085]**, including supporting the UK's net zero target, enabling the connection of new low carbon energy ` |
| **Strategic Policy S11 – The Role Of Theof the Countryside** | "When determining planning applications, the Council will carefully balance the requirement for new development within the countryside to meet identified development needs in accordance with the Spatial Strategy, and to support thriving rural communities whilst ensuring that development does not have an adverse impact on the different roles and character of the countryside. All new development within the countryside will be considered within this context and against the specific planning objectives for each of the following areas:<br>A) Green Belt<br>The openness and permanence of the Green Belt will be protected and opportunities for its beneficial use will be supported where consistent with the | The Project crosses the Metropolitan Green Belt through Chelmsford. The P**lanning Statement [APP-085]** presents an assessment of the Project against the relevant Green Belt policies. It concludes that the overhead lines comprise an engineering operation and should be regarded as not inappropriate in the Green Belt provided that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.<br>Notwithstanding the above, even if the overhead lines were considered to be inappropriate development (which is not accepted by the Applicant as set out in **5.6 Planning Statement [APP-085]** ), it is nevertheless considered that there are very special circumstances which justify their acceptability. Paragraphs 7.3.497 to 7.3.537 of the **5.6 Planning** |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | purposes of the Green Belt. Inappropriate development will not be approved except in very special circumstances.<br>B) Green Wedge<br>The Green Wedge has an identified intrinsic character and beauty and is a multi-faceted distinctive landscape providing important open green networks, which have been instrumental in shaping the City's growth, character and appearance.<br>These networks prevent urban sprawl and settlement coalescence and provide for wildlife and nature, flood storage capacity, leisure and recreation, and active travel by cycling and walking, which allows for good public access which will be further improved through the requirements of development allocated in the Local Plan. Development which materially harms the role, function and intrinsic character and beauty of the Green Wedge will not be approved.<br>C) Rural Area<br>The countryside outside of the Urban Areas and Defined Settlements, not within the Green Belt, is designated as the Rural Area. The intrinsic character and beauty of the Rural Area outside of the Green Belt, and not designated as the Green Wedge, will be recognised, assessed and development will be permitted where it would not adversely impact on its identified character and beauty.<br>The relevant Development Management Policies set out what development is appropriate in each of the | **Statement [APP-085]** consider the Project's compliance with Green Belt policy. The assessment concludes that the overhead line infrastructure should be considered to be an engineering operation and as such should not be regarded as inappropriate development in the Green Belt.<br>The **5.6 Planning Statement [APP-085]** details the Very Special Circumstances applicable in this instance to justify inappropriate development. In addition, paragraph 4.2.17 of National Policy Statement EN-1[4] also confirms that '*…the Secretary of State will take as a starting point that critical national priority infrastructure will meet the following, non-exhaustive, list of tests:*<br>Norwich to Tilbury is a vital part of the transition to net zero. Due to the growth in offshore wind generation, there has been a significant number of connections planned in the East Anglian and south-east coastal areas of England. As such, the network requires significant reinforcement to provide the connection for more offshore wind on the east coast.<br>The Project demonstrates the most direct route to connect Norwich to Tilbury which crosses through the Green Belt. Furthermore, it is considered that an overhead line solution, rather than underground cables is the appropriate technology choice.<br>The Project will not cross the Green Wedge as identified on the Chelmsford Local Plan policies map.<br>The full assessment of the potential residual effects of the Project on landscape and visual amenity is |

[4] Department for Energy Security and Net Zero (2024) *Overarching National Policy Statement for Energy (EN-1)*

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | above areas and provide detailed criteria by which development proposals will be assessed.” | contained in **ES Chapter 13: Landscape and Visual [APP-226] and ES Appendix 13.2: Landscape Baseline and Assessment [APP-228]**, **ES Appendix 13.3: Visual Baseline and Assessment (APP-229 to APP-232) and ES Appendix 13.4: Residential Visual Amenity Assessment (APP-233 to APP-234).**<br>The landscape and visual amenity assessments indicate that the construction phases would result in significant negative landscape and visual amenity effects. These significant effects are related to the introduction of construction activity and equipment, including the loss of some landscape features including farmland and field boundary vegetation. At Year 15 of operation, following the maturation of mitigation planting, the assessment concludes that significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure projects, as set out in Paragraphs 5.10.5 and 5.10.13 of NPS EN-1.<br>The Project has been designed in accordance with the mitigation hierarchy and incorporates measures to mitigate harm to landscape and visual receptors, having regard to National Grid’s statutory duty under Schedule 9 of the Electricity Act 1989 (in line with Paragraph 2.2.10 of NPS EN-5). However, some significant residual landscape and visual adverse effects will remain, as is inevitable with nationally significant energy infrastructure of the scale and type |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | proposed. In the case of CNP infrastructure (such as the Project), these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. |
| **Policy DM6 – New Development in the Green Belt** | "Within the Green Belt, inappropriate development will not be approved except in very special circumstances.<br>A) New buildings ~~is designated~~<br>Planning permission will be granted for the following exceptions to inappropriate development:<br>i. buildings for agriculture and forestry;<br>ii. provision of appropriate facilities for outdoor sport, outdoor recreation and cemeteries as long as it preserves the ~~Rural Area. The intrinsic character and beauty of the Rural Area~~ ~~outside~~openness of the Green Belt;<br>iii. limited infilling in villages in accordance with Policy DM9;<br>iv. limited affordable housing for local needs in accordance with Policy DM2;<br>v. extensions ,or alterations to buildings in accordance with Policy DM11;<br>vi. redevelopment of previously developed land in accordance with Part B of this Policy;<br>vii. replacement buildings in accordance with Part C of this Policy.<br>B) Redevelopment of previously developed land (whether redundant or in continuing use and excluding temporary building/s) | The Project is routed through the Metropolitan Green Belt between Chelmsford and the new Tilbury North Substation in Thurrock.<br>The Applicant considers that the new overhead lines and pylons would amount to an engineering operation and are not inappropriate development provided that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.<br>Notwithstanding the above, even if the overhead lines were considered to be inappropriate development (which is not accepted by the Applicant as set out in **5.6 Planning Statement [APP-085]** ), it is nevertheless considered that there are very special circumstances which justify their acceptability. Paragraphs 7.3.497 to 7.3.537 of the **5.6 Planning Statement [APP-085]** consider the Project's compliance with Green Belt policy. The assessment concludes that the overhead line infrastructure should be considered to be an engineering operation and as such should not be regarded as inappropriate development in the Green Belt.<br>The **5.6 Planning Statement [APP-085]** details the Very Special Circumstances applicable in this instance to justify inappropriate development. In addition, paragraph 4.2.17 of National Policy Statement EN-1 also confirms that '…the Secretary of State will take as a starting point that critical national |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | Where the proposal would contribute to meeting an identified affordable housing need, planning permission will be granted where the proposed development does not designated as cause substantial harm to the openness of the Green Wedge,Belt.<br>For all other proposals, planning permission will be recognised, assessed andgranted where the proposed development will be permitted where it would not adverselyhave a greater impact on its identified characterthe openness of the Green Belt and the purpose of including land within it than the existing use and beauty. /or development. The Council will assess the development based on the following:<br>i. the size, scale, massing and spread of the new development compared to the existing; and<br>ii. the visual impact of the development compared to the existing; and<br>iii. the activities/use of the new development compared to the existing; and<br>the location of the site is sustainable and appropriate to the type development proposed…" | priority infrastructure will meet the following, non-exhaustive, list of tests:<br>• Where development within a Green Belt requires very special circumstances to justify development'. |
| **Policy DM13 – Designated Heritage Assets** | "A) The impact of any development proposal on the significance of a designated heritage asset or its setting, and the level of any harm, will be considered against any public benefits arising from the proposed development. Where there is substantial harm or total loss of significance of the designated heritage asset, consent will be refused unless it can be demonstrated that the substantial harm or loss is | **ES Chapter 11: Historic Environment [AS-068]** reports the assessment of the likely significant cultural heritage effects that could result from the Project.<br>National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | necessary to achieve substantial public benefits that outweigh that harm or loss; or all of the following apply:<br>i. the nature of the heritage asset prevents all reasonable uses<br>ii. of the site; and<br>iii. use of the asset is not viable in itself in the medium term, or not demonstrably possible in terms of grant funding; and<br>iv. the harm or loss is outweighed by bringing the site back into use.<br>Where there is less than substantial harm to the heritage asset this will be weighed against the public benefits of the development proposal, including securing the optimum viable use of the heritage asset.<br>The Council will take account of the desirability of sustaining and enhancing the significance of heritage assets and the positive contribution that conservation of heritage assets can make to sustainable communities, local character and distinctiveness.<br>B) Listed Buildings<br>In addition to Part A) the Council will preserve Listed Buildings and will permit proposals where:<br>i. any extension/alteration would not adversely affect its significance as a building of special architectural or historic interest, both internally and externally; and<br>ii. development within the setting of a listed building would not adversely affect the significance of the listed building, including views to and from the | and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets.<br>**ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets [APP-215]** found that the Project would not result in substantial harm to any heritage assets. **Chapter 11: Historic Environment [AS-068]** concludes that within Chelmsford City Council the Project would result in a permanent adverse magnitude of impact to four designated heritage assets. This impact is considered to be less than substantial. The Project will impact one scheduled monument, and two conservation areas due to changes in their setting that affect their significance; however, the magnitude of change is predicted to be negligible/low and not of a substantial nature.<br>The substantial public benefits and need for the Project, as set out in **Chapter 5 of the Planning Statement [APP-085]**, including supporting the UK's net zero target, enabling the connection in East Anglia of new low carbon energy generation, and reinforcing the transmission network clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage assets of scheduled quality.<br>**With regard to non-designated heritage assets ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets [APP-215] and** |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | building, landscape or townscape character, land use and historic associations; and<br>iii. any change of use would preserve its significance as a building of special architectural or historic interest and ensure its continued use.<br>C) Conservation Areas<br>In addition to Part A) development will be permitted in Conservation Areas where: is<br>i. the siting, design and scale would preserve or enhance the character or appearance of the area; and<br>ii. building materials and finishes are appropriate to the local context; and<br>iii. features which contribute to the character of the area are retained; and<br>iv. important views are preserved.<br>Development involving demolition or substantial demolition will only be granted if it can be demonstrated that:<br>i. the structure to be demolished makes no contribution to the special character or appearance of the area; or<br>ii. it can be demonstrated that the structure is beyond repair or incapable of beneficial use; or<br>iii. the substantial public benefit would outweigh the harm; or<br>iv. it can be demonstrated that the removal of the structure would lead to the enhancement of the Conservation Area.<br>D) Registered Parks and Gardens | **Chapter 11: Historic Environment [AS-068]** conclude that within Chelmsford City Council (Section F) the Project would result in permanent adverse magnitude of impact to three non-designated heritage assets due to a change in setting but this impact would be at the lower end of the spectrum of less than substantial harm.<br>As noted in the paragraphs above the level of harm is justified by the substantial public benefits and need for the Project, as set out in **Chapter 5 of the Planning Statement [APP-085].**<br>In relation to archaeology, within Chelmsford City Council (Section F of the route), **ES Chapter 11: Historic Environment [AS-068]** has identified two priority geophysical surveys that have been undertaken which have revealed possible archaeology linear anomalies. Full details are provided in **ES Appendix 11.4: Geophysical Survey Results Report [AS-072 – AS-077]**.<br>One priority archaeological trial trench survey is proposed around pylon TB132. This will be reported in **ES Appendix 11.5: Trial Trenching Results Report [AS-078]**.<br>Mitigation measures to reduce impacts on archaeology are set out in the **Outline Archaeological Mitigation Strategy and Outline WSI [APP-328]** and include preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| | Development proposals should protect Registered Parks and Gardens and their settings. Harm should be assessed in accordance with the tests within Part A) of this policy.<br>E) Scheduled Monuments<br>Development proposals should protect Scheduled Monuments and their settings. Harm should be assessed in accordance with the tests within Part A) of this policy | |
| **DM14 – Non-Designated Heritage Assets** | Proposals will be permitted where they retain the significance of a non-designated heritage asset, including its setting. Where proposals would lead to harm to the significance of a non-designated heritage asset or its loss, proposals should demonstrate that:<br>• the harm or total loss of harm or loss is justified following a balanced judgement of harm and the significance of the designated heritage asset, consent will be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that asset; and harm is minimised through retention of apply features of significance and/or good design and/or mitigation measures. | |
| **Policy DM15 - Archaeology** | "Planning permission will be granted for development affecting archaeological sites that are of sufficient significance as to warrant preservation in situ, providing it protects, enhances or preserves the sites of archaeological interest and the contribution made by their settings to their significance. Where development would harm the significance of archaeological sites, they will be subject to | |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| | consideration under Policy DM13 A) or DM14, dependent on their level of significance.<br>Applications shall have assessed the archaeological potential of the site in consultation with the Historic Environment Record and taken account of the archaeological significance of any importance of those remains, the need for the development, the likely extent of any harm, and, in instances where archaeological remain do not warrant preservation in situ, the likelihood of the proposal successfully preserving the archaeological interest of the site by record." | |
| **Policy DM16 – Protection and Promotion of Ecology, Nature and Biodiversity** | "A) Internationally Designated Sites<br>Developments that are likely to have an adverse impact (either individually or in combination with other developments) on European Designated Sites must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoiding or mitigating against impacts where identified.<br>Where appropriate, contributions from qualifying residential developments within the Zones of Influence as defined in the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS) will be secured towards mitigation measures identified in the RAMS. B) Nationally Designated Sites<br>Development proposals within or outside a SSSI, likely to have an adverse effect on a SSSI (either individually or in combination with other developments), will not be permitted unless, on an exceptional basis, the benefits of the development | The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. **ES Chapter 8: Ecology and Biodiversity [AS-026]** presents the assessment of the likely significant ecology and biodiversity effects that could result from the Project.<br>The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, ancient woodland and veteran trees, during the construction and operation (including maintenance) phases.<br>In addition to protecting existing ecological sites and features, National Grid has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| | clearly outweigh both the adverse impacts on the features of the site and any adverse impacts on the wider network of SSSIs.<br>C) Locally Designated Sites<br>Development likely to adversely affect locally designated sites, their features or their function as part of the ecological network, will only be permitted where the need and benefits of the development clearly outweigh the loss and the coherence of the local ecological network is maintained.<br>D) Biodiversity and Geodiversity in Development<br>Development proposals should:<br>i. Conserve and enhance the network of habitats, species and sites (both statutory and non-statutory, including priority habitats and species) of international, national and local importance commensurate with their status and give appropriate weight to their importance; and<br>ii. Incorporate measures and features into the design of new buildings, extensions or renovations to increase biodiversity; and<br>iii. Avoid negative impacts on biodiversity and geodiversity, adequately mitigate unavoidable impacts and as a last resort compensate for residual impacts; and<br>Unless exempt, must provide a minimum 10% biodiversity net gain (20% on Chelmsford Garden Community and East Chelmsford Garden Community) above the existing ecological baseline value of the site, or subsequent government standard, to be calculated and reported in | provide overall net gains in habitat. The Project willachieve a minimum of 10% Biodiversity Net Gain. The Project would deliver an overall net improvement in environmental value (including biodiversity) through a combination of on-site and off-site mitigation/enhancement. This is reported in the **Biodiversity Net Gain Report [APP-299]**. There is currently no legislative requirement for BNG in respect of infrastructure projects for which development consent is required. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| | accordance with local and national best practice guidance prevailing at the time of the application, and to be secured for a minimum of 30 years after completion. Applications for engineering and other operations, and change of use in order to create biodiversity sites in appropriate locations, including sites associated with the Local Nature Recovery Strategy, will be supported." | |
| **DM17 – Trees, Woodland and Landscape Features** | A) Woodland<br>Planning permission will be granted for development proposals that do not result in unacceptable harm to the health of a preserved tree, trees in a Conservation Area or Registered Park and Garden, preserved woodlands or ancient woodlands. Consideration will also be given to the impact of a development on aged or veteran trees found outside ancient woodlands, both now and in the future.<br>Development proposals that have the potential to affect preserved trees, trees in a Conservation Area or Registered Park and Garden, preserved woodlands or ancient woodlands must set out measures to secure their protection.<br>In exceptional circumstances there may be overriding public benefits arising from the development that could justify the removal of a preserved tree or trees. In such circumstances, a replacement tree, or trees, shall be provided of a size and type suitable for its location.<br>B) Other Landscape Features<br>Planning permission will be granted for development proposals that do not result in unacceptable harm to | The Project has been designed in a way which prioritises the retention of vegetation wherever practicable in accordance with good practice measures as outlined within the **Outline CoCP [APP-300].** Owing to the size of the Project it has not been possible to completely avoid the loss of such natural features. The **Outline LEMP [AS-046]** sets out the principal measures that are required to help avoid, minimise, mitigate and compensate (where relevant) the impacts to vegetation.<br>The Project will not impact on any trees in a conservation area or Registered Park and Garden.<br>In relation to ancient woodlands, the physical extent of each ancient woodland along the Project has been mapped based on a combination of aerial imagery and information obtained from the ground truthing woodland surveys. Table 8.23 in **ES Chapter 8: Ecology and Biodiversity [AS-026]** lists the ancient woodlands identified within 200 m of the Project's Order Limits and identifies the proposed mitigation measure/commitment. The location and further information relating to all ancient woodlands is presented within **Appendix 8.1: Habitat Report, on Figure A8.1.3: Ancient Woodland Locations [AS-** |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| | natural landscape features that are important to the character and appearance of the area. Harm or loss of these features will not be permitted unless a landscape strategy, which would compensate for the loss or harm, is secured or where there are overriding public benefits arising from the development.<br>C) New Trees<br>Three new trees per net new dwelling are required to be planted for all new housing development.<br>All new strategic scale employment and infrastructure development (defined as development in excess of 1,000 sqm or 0.1 hectares) will be required to plant a significant number of new trees as part of landscaping requirements." | **028].** In addition, the Project has considered 11 woodlands to be ancient woodland within **ES Chapter 8: Ecology and Biodiversity [AS-026]** due to the Local Wildlife Site citations mentioning these woodlands support ancient woodland features. These woodlands have therefore been included in the impact assessment as ancient woodland.<br>Potential impacts (excavation and non-excavation), in the absence of mitigation, were identified at 10 ancient woodland parcels (five within ancient woodlands themselves and five within the 15 m buffer root protection zone (RPZ)). Project commitments to standard mitigation measures have completely removed potential impacts to five of these ancient woodlands and reduced impacts to one further ancient woodland.<br>Out of the remaining ancient woodlands, one woodland Writtle-Writtlepark Wood is located within Chelmsford City Council (Section F of the Project route). The north-east corner of Bosmore Wood (part of the Writtlepark Wood complex) is partially within the Order Limits due to the removal and undergrounding of the 11 kV UKPN overhead line 4 m into the woodland.<br>Undergrounding works would use delicate and precise techniques such as hand-digging or vacuum excavation to protect root structures. Bosmore Wood (part of the Writtlepark Wood complex) is also 14 m west, at the closest point, from a permanent access route (right of access only – no physical works) for construction of pylon TB180. A comprehensive explanation of the Project approach to ancient |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| | | woodland avoidance and minimisation of impact on ancient woodland is detailed in **Appendix B: Ancient Woodland and Veteran Tree Strategy [APP-323].**<br><br>With regard to veteran trees, a desk study was undertaken to determine the location of veteran trees recorded within 30 m of the Order Limits. An arboricultural survey was also undertaken between May 2023 and May 2025. **Figure B.A.3 in the Ancient Woodland and Veteran Tree Strategy [APP-323]** shows the location of veteran trees. A full record of the identified veteran trees is included in Table 7.3 of the **Outline LEMP [AS-046]. Annex D of the Ancient Woodland and Veteran Tree Strategy [APP-323]** lists the veteran trees within the Study Area and identifies the assumed mitigation. The **Ancient Woodland and Veteran Tree Strategy [APP-323]** states that based on the existing overhead line alignments without considering the LoD, this is an initial assessment of veteran tree removals and impacts and all attempts should be made during detailed design to retain veteran trees where practicable (see commitment B17 in the **CoCP [APP-300]**). The **Ancient Woodland and Veteran Tree Strategy [APP-323]** details the management outcomes for veteran trees. The final mitigation measures, remediation works and long-term monitoring are to be agreed at detailed design stage with the Project arboriculturist and the relevant landowners on a case-by-case basis. All management options discussed for veteran trees need to be achievable and therefore will need landowner consent and agreement with National Grid. Protection measures are to be in place prior to |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| | | the commencement of construction or pre-construction works and require sign off by the Project Arboriculturist.<br>Within Chelmsford City (and Brentwood Borough), the Arboricultural Impact Assessment notes that a number of high and moderate quality features will be affected. A total of 49 individual trees will be removed; 27 groups of trees will be partly removed; 13 individual trees and 4 groups will be affected / managed; 60 individual trees and 7 groups will be retained with protection measures.<br>Unavoidable tree loss will be compensated through the implementation of landscape design including new tree planting (refer to **ES Chapter 13: Landscape and Visual [APP-226] and the Outline LEMP [AS-046]**). The Outline LEMP notes that compensatory tree planting for individual trees and small groups of individual trees will be provided at a 3:1 ratio using local provenance stock of native species with awareness to pests and diseases, with species and numbers. Where possible vegetation lost during construction will be replanted in the same location as previously apart from where permanent infrastructure prohibits this. |
| **Policy DM18 – Flooding/SUDS** | A) Planning permission for all types of development will only be granted where:<br>• it can be demonstrated that the site is safe from all types of flooding, either because of existing site conditins or through flood risk management from the development, now and for the lifetime of the development; and | The **FRA [APP-331]** has been submitted as part of the application for development consent focussing on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. A sequential approach has been taken in siting the Project. The parts of the Project located in the Chelmsford City Council area (Section F of the Project route) are mostly located in Flood Zone 1. As addressed in the |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| | • it does not worsen flood risk elsewhere.<br>• B) In addition to above Part A) development within areas of flood risk will be required to:<br>• provide a safe dry refuge and a safe means of escape or suitably manage risk through some other means; and<br>• manage surface water run-off so that the discharge rate will not exceed the equivalent 1 in 1 greenfield rate, unless there are overriding reasons for not doing so; and<br>• locate the most vulnerable development in areas of lowest flood risk unless there are overriding reasons for not doing so; and<br>• provide wider sustainability benefits to the community that mitigate flood risk.<br>C) All major development will be required to incorporate integrated water management measures such as rainwater/stormwater harvesting to reduce surface water run-off and ensure that it does not increase flood risk elsewhere.<br>The principal method to do so should be the use of Sustainable Drainage Systems (SuDS). As well as providing appropriate water management measures, where possible SuDS should be multifunctional to deliver amenity, recreational and biodiversity benefit for the built, natural (including green infrastructure) and historic environment.i<br>D) Surface water connections should follow the sustainable drainage hierarchy with connection to the public sewerage network only made where it can be demonstrated that there are no feasible alternatives | **FRA [APP-331]** there are two pylons proposed in the floodplain in Section F that would need compensatory storage.<br>The Risk of Flooding from Surface Water map (see **ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]**) shows that most of the land within Section F is at very low risk of surface water flooding. As shown in the **FRA [APP-331]**, where there are interactions between the Project and the high-risk zone during construction, these are mostly where temporary haul roads and pylon construction working areas are proposed. However, there are small parts of the temporary construction compound off Braintree Road, near TB134, Chelmsford (TB-Main) shown to be at high risk of surface water flooding. The requirements for compensation of loss of floodplain storage associated with these pylons is secured by commitment W17 in the **Outline CoCP [APP-300].**<br>Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures. These measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk.<br>During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the FRA. Above ground structures such as pylons |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| | (this applies to new developments and redevelopments) and where there is no detriment to existing users. Surface water connections to the foul sewer will not be permitted, and only to a combined sewer in exceptional circumstances." | and below ground structures such as the underground cable are designed to National Grid's technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement.<br>The **Outline CoCP [APP-300]** describes the good practice measures, including SuDS, for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime. The **FRA [APP-331]** states that access roads and haul roads, as well as areas where impermeable material will be installed in areas where heavy equipment would be used, will also have suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff. |
| **Policy ~~DM18 – Flooding/SUDS~~DM23 – High Quality and Inclusive Design** | "A) "Responding to Context<br>Planning permission for all types of development will only be granted where:<br>~~i. it can be demonstrated that the site is safe from all types of flooding, either because of existing site conditions or through flood risk management from the development, now and for the lifetime of the development; and~~<br>for development that respects the character and appearance of the area in which it is located. Development must be well-designed to ensure it is compatible with its surroundings having regard to | The **Design and Access Statement [APP-353]** and **Design Approach for Site Specific Infrastructure [APP-354]** set out a summary of National Grid's approach to good design. The **Design Development Report [APP-122], ES Chapter 3 Alternatives [APP-127], Design and Access Statement [APP-353] and Design Approach for Site Specific Infrastructure [APP-354]** provide an overview of the design rationale for the Project. They outline how the design choices have sought to reduce the environmental effects of the Project and demonstrate that the design has incorporated mitigation measures in order to avoid or reduce significant environmental effects wherever practicable. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| | scale, siting, form, architecture, materials, boundary treatments, landscape and function…"<br>~~provide a safe means of escape or suitably manage risk through some other means; and~~<br>~~ii. manage surface water run-off so that the run-off rate is no greater than the run-off prior to development taking place or, if the site is previously developed, development reduces run-off rates and volumes as far as is reasonably practical; and~~<br>~~iii. locate the most vulnerable development in areas of lowest flood risk unless there are overriding reasons for not doing so.~~<br>~~C) All major development will be required to incorporate water management measures to reduce surface water run-off and ensure that it does not increase flood risk elsewhere. As well as providing appropriate water management measures, where possible SuDS should be multi-functional to deliver benefits for the built, natural and historic environment.~~<br>~~Surface water connections to the public sewerage network should only be made where it can be demonstrated that there are no feasible alternatives (this applies to new developments and redevelopments) and where there is no detriment to existing users".~~ | The **Design Development Report [APP-122]** also explains the changes that were made to the Project as a result of feedback from the 2024 consultation process. The process of reviewing and responding to consultation feedback is explained in the **Consultation Report [APP-066].**<br>In line with national policy requirements, the Project has been designed following the mitigation hierarchy and has avoided impacts where possible through the routeing and siting process. Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features as far as reasonably practicable.<br>National Grid has embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project. |
| **Policy DM29 – Protecting LivingDM30 – Contamination and** | A) Hazardous Substance Sites or Land~~"Planning~~<br>For developments on, or near to, hazardous substance sites or land which is contaminated or has | **ES Chapter 9: Contaminated Land, Geology and Hydrogeology [APP-181]** considers land contamination and is supported by a Preliminary |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| **Working EnvironmentsPollution** | a history of a potentially contaminating use, permission will only be granted ~~for development proposals provided~~where the ~~development:~~ Council is satisfied that:<br>• there will be no threat to the health or safety of future users or occupiers of the site or neighbouring land; and<br>• there will be no adverse impact on the quality of local groundwater or surface water.<br>~~i.~~ B) Air Quality Management Area ~~safeguards the living environment of the occupiers of any nearby residential property by ensuring that the development is not overbearing and does not result in unacceptable overlooking or overshadowing. The development shall also not result in excessive noise, activity or vehicle movements; and~~<br>is compatible with neighbouring or existing uses in the vicinity of the development by ensuring that the development avoids unacceptable levels of polluting emissions by reason of noise, light, smell, fumes, vibrations or other issues, unless appropriate mitigation measures can be put in place and permanently maintained...".For developments in or adjacent to an Air Quality Management Area, or where an air quality impact assessment has been provided, permission will only be granted where the Council is satisfied that after selection of appropriate mitigation the development will not have an unacceptable impact on air quality and the health and wellbeing of people." | Contamination Risk Assessment (PRA) (**ES Appendix 9.1: Baseline Information and Preliminary Contamination Risk Assessment [APP-182]**). The PRA has identified a generally 'very low/low risk' of significant existing contamination to be present within most of the Order Limits. There are no sites in the Chelmsford City Council area assessed as presenting a potential Moderate or above risk to sensitive receptors from existing contamination.<br>Standard mitigation measures within the **Outline CoCP [APP-300]** will be adopted during construction to deal with unexpected land contamination.<br>The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routeing and siting of infrastructure and temporary works. **ES Chapter 7: Air Quality [APP-147]** assesses the likely air quality effects that would result from the Project and considers the existing baseline conditions and the likely changes and effects to air quality levels during the construction phase. As set out in the **Scoping Report [APP-288 to APP-296]** and agreed within the **Scoping Opinion [APP-297],** the operational phase of the Project will not result in any significant impacts to air quality and no further assessment has been carried out in the ES. AQMAs and Council Air Quality Action Plans have been taken into consideration as a part of this assessment. The assessment confirms that with the implementation of the proposed |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| | | standard mitigation measures, the effects of construction on air quality in regard to dust soiling, and human health effects are anticipated to be not significant.<br>**ES Chapter 10: Health and Wellbeing [APP-192]** details the assessment of the potential residual effects of the Project on Health and Wellbeing. The assessment includes a series of embedded and standard mitigation measures considered as part of the integral environmental appraisal considered from the outset. Section 10.7 of ES Chapter 10 demonstrates that the likely significant effects of the Project can be mitigated through the proposed measures, such to comply with national, regional and local policy. These measures have been informed through the engagement and consultation activities that have taken place with stakeholders, which has helped to provide for a well-informed approach that takes into account local demographics and health considerations. |
| ~~**Policy DM30 – Contamination and Pollution**~~**Policy DM31 – Net Zero Carbon Development (In Operation)** | "A) New build development (residential and non-residential)<br>All new buildings must be designed and built to be Net Zero Carbon in operation. They must be ultra-low energy buildings, fossil fuel free, and generate renewable energy on-site to at least match predicted annual energy use.<br>All new buildings (1 dwelling and above for residential; 100m2 floorspace and above for non-residential) are required to comply with Requirements 1 to 5 as set out below… | The need for the Project is to support the connection and transfer of green, renewable energy into the NETS network. The Project would support the UK's net zero target to achieve net zero emissions by 2050 through the connection in East Anglia of new low carbon energy generation, and by reinforcing the transmission network.<br>A Greenhouse Gas Assessment (**Appendix 4.1 Greenhouse Gas Assessment of ES Chapter 4: Project Description [APP-131]**) has been prepared in support of the Project. This identifies the carbon dioxide equivalent emissions that would be released |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| | Requirement 2: Fossil fuel free<br>i. No new buildings shall be connected to the gas grid; and<br>ii. Fossil fuels must not be used on-site to provide space heating, domestic hot water or cooking.<br>Requirement 3: Energy Use Intensity (EUI) limits…<br>iii. The following non-residential buildings must achieve an Energy Use Intensity (EUI) of no more than the following (where technically feasible) by building type or nearest equivalent:<br>– Offices 70 kWh/m2 GIA/year<br>– Schools - 65 kWh/m2 GIA/year<br>– Light Industrial 35 kWh/m2 GIA/year<br>For other residential and non-residential buildings, that are not covered by (i) and (ii) above, applicants should report their energy use intensity but are not required to comply with a certain limit.<br>Requirement 4: On-site renewable energy generation<br>Renewable energy must be generated on-site for all new developments on, or near to, hazardous substance sitesby whichever of the following results in the greater amount of roof top solar PV energy (electricity) generation:<br>i. The amount of energy generated in a year should match or landexceed the predicted annual energy use of the building, i.e. renewable energy generation (kWh/m2/year) = or > predicted annual energy use (kWh/m2/year)*; or | during the construction and operation of the Project. The assessment concludes that the construction and operational CO2e numbers are not considered to have a material impact on the ability of the Government to meet its carbon reduction targets and therefore are not significant. Therefore, the operational, medium to long term benefits of delivering the Project on a national level are considered to outweigh any short-term impacts of GHG emissions because of material use and construction activities. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| | ii. The amount of energy generated in a year is:<br>– at least 80 kWh/m2 building footprint per year* for all building types; and<br>– at least 120 kWh/m2 building footprint per year* for industrial buildings.<br>*For development proposals where it is demonstrated to the satisfaction of the Local Planning Authority that meeting Requirement 4 is not technically feasible then renewable energy generation on-site should be maximised and the residual amount of renewable energy generation (equivalent to the shortfall in meeting the annual energy use of the building in kWh/year) must be offset by a financial contribution (to cover the administration, purchasing and installation of a solar PV renewable energy (electricity) system elsewhere in the plan area or County, which is contaminated or has a history of a potentially contaminating use, permission will only be granted where the Council is satisfied that: able to generate a similar amount of energy) and be paid into the Council's offset fund.<br>The offset price is set at £1.35 per kWh or the most recent updated version and the contribution shall be calculated at the time of planning application determination.<br>Requirement 5: As-built performance confirmation and in-use monitoring<br>i. All developments must submit as-built performance information at completion and prior to occupation; and | |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| | ii. In-use energy monitoring is required on a minimum of 10% of dwellings for development proposals of 100 dwellings or more, for the first 5 years of operation.<br><br>Alternative routes to meeting policy requirements<br><br>i. Proposals that are built and certified to the Passivhaus Classic or higher Passivhaus standard are deemed to have met Requirements 1 and 3. Requirements 2, 4 and 5 must also be met to achieve policy compliance…"<br><br>~~ii.~~<br><br>~~For developments in or adjacent to an Air Quality Management Area, or where an air quality impact assessment has been provided, permission will only be granted where the Council is satisfied that after selection of appropriate mitigation the development will not have an unacceptable impact on air quality and the health and wellbeing of people".~~ | |
| **Basildon Borough Council Local Plan 2023 – 2043 (Draft Plan Regulation 18.3 Consultation November 2025)** | | |
| **Policy CC1:**<br>**Responding to Climate Change** | The Council will seek interventions for climate resilience and the reduction of greenhouse gases by requiring development to:<br>1) Have good access to services, safe active travel routes and public transport;<br>2) Incorporate design features that protect existing and provide new opportunities for urban planting. This will create well-connected multifunctional | The reinforcement provided by the Project will ensure we have sufficient infrastructure to support the transition to net zero and therefore the Project will support the climate change objectives of maintaining safe, secure, affordable and low carbon supplies of energy.<br>National Grid has assessed potential impacts of climate change and incorporated |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
|---|---|---|
| | green- blue infrastructure, nature recovery and biodiversity net gain and engender cobenefits for health;<br>3) Reduce greenhouse gas emissions and be fossil fuel free where practical, achieve operational energy and carbon (net zero) and minimise embodied carbon;<br>4) Minimise energy demand and incorporate energy efficiency measures;<br>5) Promote the efficient use of natural resources, such as water, including natural flood risk management and surface water management systems e.g. SUDs which includes blue-green roofing;<br>6) Provide opportunities for renewable and low carbon energy technology development and decentralised energy and heating systems;<br>7) Ensure that buildings (both internally and externally) and the spaces around them are designed to avoid overheating and excessive heat generation, while minimising the need for internal air conditioning systems; and 8. Minimise the impact of flooding from all sources.<br>8) All urban planting, including SuDs, must be accompanied by a planting management and maintenance plan. | adaptation/resilience throughout the lifetime of the Project. National Grid has taken into account the impacts of climate change over the development lifetime.<br>Consideration of climate change effects on flood risk over the lifetime of the Project are assessed within the **FRA [APP-331]** which also documents the embedded and good practice measures included to make the Project resilient to climate change.<br>National Grid has assessed potential impacts of climate change and incorporated adaptation/resilience throughout the lifetime of the Project. The Project has been designed to be resilient to climate change by locating the above ground elements of the Project, including the substations, CSE compounds and construction compounds, outside of Flood Zones 2 and 3 as described in the FRA.<br>National Grid has undertaken a GHG assessment in **ES Appendix 4.1: Greenhouse Gas Assessment [APP-131].** The assessment concludes that the construction and operational CO2e numbers are not considered to have a material impact on the ability of the Government to meet its carbon reduction targets and therefore are not significant.<br>As outlined in the **Greenhouse Gas Assessment [APP-131]** It is assumed that no SF6 equipment will be used in the Project, in accordance with National Grid policy. SF6 alternatives such as C4 or G3 have a 99% lower global warming potential (GWP) than SF6. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | Measures to reduce greenhouse gas emissions are set out in **Appendix H of the CoCP: Greenhouse Gas Reduction Strategy[(APP-308].** |
| **Policy CC2: Addressing Flood Risk** | 1. To ensure new development within Basildon Borough does not increase the number of people and properties at risk of flooding, the Council will use the findings of the Basildon Borough Council Level 1 Strategic Flood Risk<br>Assessment (SFRA) (2024) and:<br>1.1 Apply a sequential risk-based approach to the allocation of land for new development to guide it to areas with the lowest risk of flooding. In doing so, the Council will consider the flood vulnerability of the proposed use. The Exception Test will be applied, if required;<br>1.2 Require a site-specific flood risk assessment for:<br>• all developments of 1 hectare and greater in Flood Zone 1;<br>• all new development, including minor builds and changes of Use, in Flood Zones 2 and 3; and where the proposed development is for a more vulnerable Use Class that may be subject to other forms of flooding.<br>1.3 Ensure that new development is safe, resilient and does not increase the risk of flooding elsewhere, and that pluvial flood risk is managed effectively onsite;<br>1.4 Use appropriate nature-based solutions to mitigate flood risk as set out in Natural England's Green Infrastructure Framework (2023) and the | The **FRA [APP-331]** has been submitted as part of the application for development consent focussing on flood risk from fluvial, tidal/coastal, pluvial (surface water) and groundwater sources. A sequential approach has been taken in siting the Project. The parts of the Project which lie in the Basildon Borough Council area (Section G of the Project route) are mostly in Flood Zone 1. As addressed in the **FRA [APP-331]** there are no pylons within Basildon which would require compensatory flood plain (Pylon 202, adjacent to the River Wid is within Brentwood).<br>The Risk of Flooding from Surface Water map (Environment Agency, 2025) shows that most of the land within Section G is at very low risk of surface water flooding. As shown in the **FRA [APP-331]**, where there are interactions between the Project and the high risk zone during construction, these are mostly where temporary haul roads and pylon construction working areas are proposed.<br>The FRA has concluded that the Project during its construction would be generally at low risk of flooding from rivers. Locally higher risks, particularly to temporary works within main river floodplains, would be reduced through embedded and good practice measures. These measures would also protect construction workers, limit damages to construction equipment and materials and also limit any impacts of the Project on fluvial flood risk. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | Essex Green Infrastructure Strategy (2022), such as woodland or wetland creation; and<br>1.5 Identify opportunities for new development to make a proportional financial contribution, as identified in the Infrastructure Delivery Plan (IDP), for off-site flood risk management infrastructure and/or surface water management measures as identified in the South Essex Surface Water Management Plan Action Plan (2020, or as amended), where they will provide benefits and/or protection to the development proposed.<br>2. To manage existing flood risk, and to address the implications of climate change on flood risk, the Council will work in partnership with the Water Authorities, Environment Agency, the Lead Local Flood Authority and other relevant Flood Management Authorities to:<br>2.1 Develop a riverside strategy covering the marshlands to the south of Basildon, in conjunction with neighbouring authorities, with the aim of providing ongoing flood protection for critical infrastructure and important habitats, whilst also preparing for the longer term need to create new inter-tidal habitat as detailed in the TE2100 Plan; and<br>2.2 Continue to safeguard the existing network of washlands as flood risk Zone 3b to provide ongoing flood and storm water attenuation and support the delivery of further surface water management measures as set out in the South Essex Surface Water Management Plan Action Plan (2020, or as amended). | Permanent above ground infrastructure for the Project in the floodplain would be limited to a small number of the pylons for the overhead line. The requirements for compensation of loss of floodplain storage associated with these pylons is addressed in the following sub-section and secured by commitment W17 in the **Outline CoCP [APP-300].** |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | 3. The location and extent of the Borough's washlands are defined on the Policies Map. Development is required to protect and where possible increase the capacity of existing washland areas to retain water. Where development is exceptionally permitted within a washland, the following mitigation must be secured:<br>3.1 The area of washland lost must be replaced with an area of water storage of an equivalent size within the development; and 3.2 The replacement provision must serve the same Critical Drainage Area as that which is lost and must not result in flood risk increasing elsewhere on the drainage network. | |
| **Policy CC3: Water Efficiency and Sustainable Drainage Systems (SuDS)** | 1. All development shall demonstrate water efficiency. This is to be achieved by ensuring that:<br>1.1 New residential development is designed to utilise no more than 85 litres per person per day of mains supplied water/ potable water per person per day (l/p/d).<br>1.2 New, extended or redeveloped non-household* buildings achieve full credits under the 4 water categories (WAT01, WAT02, WAT03, and WAT04) for BREAAM standard within a minimum score of 3 credits for WAT01 Water Consumption issue category or its equivalent standard set out in any future update to BREAAM. Where a development cannot achieve full credits, the applicant must provide satisfactory evidence to justify why a full credit score is not possible/viable for the development.<br>2. All new development shall incorporate Sustainable Drainage Systems (SuDS) for the management of | With regard to sustainable drainage the **Outline CoCP [APP-300]** describes the good practice measures including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime. The **FRA [APP-331]** states that access roads and haul roads, as well as areas where impermeable material will be installed in areas where heavy equipment would be used, will also have suitable drainage provisions. Drainage features will provide attenuation and treatment of runoff appropriate to local conditions. **Appendix C of the FRA [APP-331]** contains further details on SuDS.<br>The **FRA [APP-331]** concludes that the Order Limits avoid encroaching into Areas of Critical Drainage. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | surface water run-off, unless it can be clearly demonstrated that this would be inappropriate or would result in significant harm to water quality, flood risk, or biodiversity. Minor developments should, where feasible,<br>integrate SuDS features such as bluegreen roofs, permeable paving, and rainwater planters.<br>3. All new development will be required to incorporate water management measures, including integrated<br>measures (e.g. rainwater/stormwater harvesting and reuse), to reduce surface water run-off or adverse<br>impacts on water quality and ensure that it does not increase flood risk elsewhere. The principal method to do<br>so should be the use of Sustainable Drainage Systems (SuDS). As well as providing appropriate water management measures, where possible SuDS should be designed to be multi-functional to deliver amenity, recreational and biodiversity benefit for the built, natural (including green infrastructure) and historic environment. All proposals for SuDS should include arrangements for<br>their whole life management and maintenance.<br>4. All new major developments will be required to submit a drainage strategy to demonstrate how both on-site and off-site flood risk will be managed; and mitigation measures will be satisfactorily integrated into the design and layout of the development and have due regard to Essex County Councils SuDS Design Guide. | |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | 5. Surface water disposal routes should be considered in accordance with the surface water disposal hierarchy. No<br>new surface water connections should be made to the foul sewer system.<br>6. For all major development proposals, it must demonstrated that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site.<br>** Note: 'non-household' means all development except residential dwellings.* | |
| **Policy CC6: Renewable and Low Carbon Energy Infrastructure** | 1. Proposals for renewable and low carbon energy schemes will be positively considered in the context of contributing to the achievements of sustainable development and a low carbon future.<br>2. There will be a presumption in favour of proposals that contribute towards the transition to net zero. Proposals will be supported provided they:<br>2.1 Do not cause demonstrable harm to residential amenity;<br>2.2 Avoid or minimise impacts to the historic environment;<br>2.3 Have no adverse impacts on the natural environment including designated sites;<br>2.4 Do not have an unacceptable visual impact harmful to the landscape and character of an area; and<br>2.5 Will not have a detrimental impact to highway safety. | The Project makes a significant contribution to Net Zero by providing significant reinforcements to the transmission system which will facilitate the connection of future sources of renewable and low carbon power generation along the coast and therefore will facilitate the achievement of Net Zero.<br>The mitigation hierarchy has been applied to the design of Project, to, in the first instance, avoid or reduce and reduce health and wellbeing impacts through the process of design development. This has included sensitive routeing and siting of infrastructure. The Project has avoided sensitive features such as centres of population and community, healthcare, and education facilities, through the corridor and routeing studies.<br>With regard to residential amenity, **Appendix 13.4: Residential Visual Amenity Assessment [APP-233 to APP-234]** describes the change in views likely to be experienced by residents at the closest residential |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | 3. Within Green Belt, any renewable or low carbon energy development will need to demonstrate its very special circumstances in order to be acceptable.<br>4. The retrofit of renewable energy will be supported in appropriate locations and where necessary, should follow a fabric first approach to the building.<br>5. There is potential for new and emerging technologies to provide innovative schemes to support the renewable energy sector. The Council recognises this and will work with an applicant to ensure suitable solutions are identified and developed. | properties to the overground sections of the Project (within approximately 200 m of the centre line). The purpose of the RVAA is to determine whether the overall change to visual amenity would breach the Residential Visual Amenity Threshold at any of these properties, considering whether the Project would be of such a nature that it may permanently affect living conditions or Residential Amenity. The assessment established that whilst a high magnitude of visual effect is anticipated for 37 of the properties scoped in, no instances have been found where effects on Residential Visual Amenity would be so great that the Residential Visual Amenity Threshold would be breached. The groups of properties included within the Residential Visual Amenity Assessment in Basildon (G11, G12 and G13) have been assessed as likely to experience a medium to medium to high magnitude of effect.<br>**ES Chapter 11: Historic Environment [AS-068]** reports the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | **ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets [APP-215]** found that the Project would not result in substantial harm to any heritage assets. Whilst the Project will not result in substantial harm to designated heritage assets **ES Chapter 11: Historic Environment [AS-068]** concludes it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting.<br><br>The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by embedding measures into the design of the Project. **ES Chapter 8: Ecology and Biodiversity [AS-026]** presents the assessment of the likely significant ecology and biodiversity effects that could result from the Project. The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats during the construction and operation (including maintenance) phases.<br><br>Traffic generated by the Project is not expected to result in any significant adverse environmental effects with the implementation of appropriate mitigation measures, including the Outline CTMPs. It is also not expected that the Project will have a significant impact on the strategic or local highway networks in terms of their capacity and highway safety. Overall, |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | the Project would not have an unacceptable impact on highway safety or result in severe residual cumulative impacts on the SRN or local road network. The Project also include measures in the **Outline CTMP [APP-309]** to encourage sustainable transportation for the workforce, in a way which reduces both environmental and social impacts on the local area.<br><br>The Project includes works within the Metropolitan Green Belt. The works within Basildon comprise of standard height pylons. As outlined in **Chapter 7 of the Planning Statement [APP-085],** National Grid considers that the proposed overhead line comprises an engineering operation and should therefore not be regarded as inappropriate development in the Green Belt provided that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.<br><br>Notwithstanding the above, even if the overhead lines were considered to be inappropriate development (which is not accepted by the Applicant as set out in **5.6 Planning Statement [APP-085])**, it is nevertheless considered that there are very special circumstances which justify their acceptability. Paragraphs 7.3.497 to 7.3.537 of the **5.6 Planning Statement [APP-085]** consider the Project's compliance with Green Belt policy. The assessment concludes that the overhead line infrastructure should be considered to be an engineering operation and as such should not be regarded as inappropriate development in the Green Belt. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | The **5.6 Planning Statement [APP-085]** details the Very Special Circumstances applicable in this instance to justify inappropriate development. In addition, paragraph 4.2.17 of National Policy Statement EN-1[5] also confirms that '*…the Secretary of State will take as the starting point that critical national priority infrastructure will meet the following, non-exhaustive, list of tests:*<br>*Where development within a Green Belt requires very special circumstances to justify development'.* |
| **Policy D2: Major Developments - Design** | The Council will require all major developments to be of high-quality built form and urban design, which should<br>reflect the following principles:<br>1. Respect the natural environment of biodiversity and amenity interests through the provision of a range of green spaces with urban planting for co-benefits;<br>2. Respond positively to local character and context to preserve and enhance the quality of existing communities in line with Essex-wide standards and Government guidance, on which the forthcoming *Basildon Borough Design Code* will be based. Development that is not well-designed will be refused where it fails to reflect Government guidance on design, local design policies, and the Code;<br>3. Have a positive visual impact, being visually coherent, interesting, and attractive; create well-connected places that prioritise cycling, walking, | The design evolution of the Project has been an iterative process. National Grid has considered ways to achieve good design through the careful consideration of route corridors and the application of design principles. National Grid has also considered alternative design suggestions made in written representations, during consultation feedback from external stakeholders.<br>The design considerations have taken place within the context of meeting National Grid's duty to be economical and efficient and also within the rigorous health and safety processes that National Grid has in place that govern how it designs and constructs its projects safely.<br>Regard has also been had to the Horlock and Holford rules in respect to the siting of new transmission infrastructure and substations, as described in the **Planning Statement [APP-085]**, **Design and Access Statement [APP-353] and Design** |

[5] Department for Energy Security and Net Zero (2024) *Overarching National Policy Statement for Energy (EN-1)*

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | wheeling, and public transport services above the use of the private car;<br>4. Where possible, provide a mix of land uses and densities with well-defined public and private space;<br>5. Encourage site design and individual building design that minimises energy consumption and provides climate<br>resilience , with reference to Policy D1 and Policy CC1;<br>6. Create attractive, multi-functional, inclusive, overlooked, and well maintained public realm, and enhance the setting of existing public realm following on from the principles set out in Policy D1;<br>7. Provide streets and spaces that are overlooked, active and promote inclusive access including parking facilities that are well integrated as part of the overall design;<br>8. Public and private accessible amenity space must be distinct, safe, inclusive, secure and provide opportunities for social interaction and recreation that contributes to the health and wellbeing of communities. Natural surveillance should be provided for public amenity spaces where practical in order to enhance security;<br>9. Provide good quality access to public open space and contribute to green infrastructure in line with existing Essex-wide standards. Open space should include good quality provision for play and recreation that is safe, inclusive, and accessible to all age groups. Sufficient usable open space must be provided beyond land required for SuDS, | **Approach for Site Specific infrastructure [APP-354].**<br>The Project has been designed in a way which prioritises the retention of vegetation wherever practicable in accordance with good practice measures as outlined within the **Outline CoCP [APP-300]**. Owing to the size of the Project it has not been possible to completely avoid the loss of such natural features. The **Outline LEMP [AS-046]** sets out the principal measures that are required to help avoid, minimise, mitigate and compensate (where relevant) the impacts to vegetation. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | 10. Retain existing trees and other landscape features where appropriate and explore opportunities for new tree<br>planting;<br>11. Provide opportunities to promote healthy living and to improve health and wellbeing, including community gardens with food growing;<br>12. Ensure buildings address the street and provide a suitable level of enclosure to surrounding streets and<br>spaces;<br>13. Provide temporary use of sites and premises for cultural activities, particularly in locations where they can help to animate the public realm, and the provision of public art will be supported.<br>14. Where proposals relate to allocated sites or land adjacent to allocated sites, initial applications must be supported by an allocation-wide framework or masterplan. This must demonstrate how the development will be delivered in a coordinated and comprehensive manner, incorporating the design principles set out above. In particular, the framework should:<br>14.1 Show how movement networks (including active travel), green and blue infrastructure, and housing densities will be coordinated across and between the wider allocations;<br>14.2 Ensure that existing and proposed individual parcels are physically and functionally connected; | |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | 14.3 Set out the location and phasing of strategic infrastructure, including schools, utilities, and community facilities;<br>14.4 Provide design coding principles to guide consistency in character and quality;<br>14.5 Identify the location and phasing of Gypsy and Traveller pitches, where required by Policy HOU4 and the Site Allocation policy.<br>15. All subsequent applications must be in general accordance with the framework. Proposals for part of an allocation must not prejudice the development potential of the wider site and must demonstrate how the remainder can be delivered in line with the aspirations and principles of the relevant site allocation policy and framework.<br>16. For other complex and large-scale development proposals not covered by site allocation policies, a masterplan or design code may still be required. | |
| **Policy HC2: Public Open Spaces, Local Green Spaces, Sport and Recreation** | 1. The Council will protect and enhance the Boroughs parks, public open spaces and playing fields, working closely with a range of stakeholders to address deficiencies in quantity, quality, and access.<br>2. Public open spaces should be safe, inclusive and easily accessible through walking, cycling, and public transport for all users, and supportive infrastructure such as crossings, cycle parking, bus stops, and clear signage should be provided appropriately near the entrance of open spaces;<br>3. There is a presumption against development of existing open space, local green spaces, allotments, sports and recreational buildings and land, playing | An Open Space Assessment has been prepared and reported in **Appendix B Open Space Assessment of the Planning Statement [APP-085].** Open Space is defined in National Policy Statement EN-1 as including green and blue infrastructure. The Project has sought to avoid areas of open space, including green and blue infrastructure.<br>The Project does directly interact with the following potential areas of open space.<br>• Angling Lake at Dukes Farm, accessed off Church Lane, Dunton<br>• Havering's Grove Brook and River Wid |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | fields (including Associated with Education Facilities), unless:<br>3.1 A surplus of provision is identified in the locality, and the development will result in replacement provision of equal or better quantity and/or quality on an alternative site nearby; or<br>3.2 The development is for education and/or sports provision, and opportunities to ensure the remaining provision is of a high quality are incorporated into the proposals; or<br>3.3 As part of the change of use or redevelopment of individual education facilities; or<br>3.4 The development proposal is for regeneration or estate renewal.<br>4. All major and strategic development should contribute to the delivery of sufficient new publicly accessible open space on-site which should:<br>4.1 meet the needs of current and any future residents;<br>4.2 be of a high-quality that is accessible to all;<br>4.3 provide multiple benefits, including recreation, food growing, SuDS, improvements to biodiversity, nature recovery, and links to create, maintain and encourage high-quality green infrastructure, as well as any blue infrastructure, on and adjacent to the development site.<br>5. The existing Playing Pitch and Built Facilities Strategies seek to improve the quality, quantity, accessibility, and sustainability of provision in the Borough. Unless on-site provision is specified within a strategic housing site allocation policy, all other | • St Margarets Wood and Lane.<br>The Dukes Farm Angling Lake is oversailed by conductors between proposed pylons TB227 and<br>TB228 and it is currently used for angling. Conductors between existing pylons PSC8 and PSC9 currently run along the southern edge of the pond, and these are to be dismantled and undergrounded as a result of the Project, which will entail a temporary impact.<br>The presence of a 400kV overhead line and the need to maintain a 30m clearance for angling activities would prevent angling activities from continuing on this site. Therefore, there will be a loss of the use and function of this open space for the purposes of angling, and accordingly an assessment of provision must be made in accordance with paragraph 5.11.10 of EN-1.<br>Following engagement with the landowner, it is understood that the site is currently used for angling on a day ticket basis. The lake is approximately 0.3ha in size, however, the existence of the conductors between PSC8 and<br>PSC9 already prohibits angling along the southern side of the pond.<br>Resultantly, the provision for angling at this pond is limited.<br>The assessment presented in the Planning Statement has evidenced that there are several alternative options for angling within the locality. Given the limited useable area of the site, and the availability of |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | residential developments will be expected to contribute towards off-site provision in accordance with the approach set within these strategies.<br>6. The locations of existing allotment gardens are identified on the Policies Map with the notation HC2a, and a schedule of these allotment gardens is included in Appendix 1. These areas are to be retained for use as allotment gardens, and opportunities to improve these spaces and create more plots through the delivery of strategic housing allocations will be pursued, having regard to other relevant policies set out in this plan.<br>7. The locations of private open spaces with conditional access for primary users are identified on the Policies Map with the notation HC2c and listed within Appendix 1.<br>7.1 These will be retained for their primary sport or recreation uses;<br>7.2 The development of appropriate facilities including changing rooms, toilets and car parking will be supported;<br>7.3 Where development would involve the loss of private pitches, provision will be expected to be relocated to maintain the security of local playing pitch provision in the Borough. Private open spaces including ancillary facilities, should be replaced with an equivalent or better facility, in terms of quantity and quality, in a suitable location. | angling locations nearby, the loss of this lake for angling is justified as it is surplus to requirements.<br>Further to this, it is considered that the positive benefits of the Project (including need) outweigh the negatives associated with the loss of this small angling facility. |
| **Policy NE1: Conserving and** | 1. Development proposals will be supported where they protect and enhance international, national, and/or locally designated sites of importance for | The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| **Enhancing the Natural Environment** | nature conservation, ecological and/or geological value.<br>2. The Council will ensure that, where appropriate, development delivering net additional dwellings or net non-residential floor space (100 square meters or more) takes a positive approach to enhancing, protecting, and creating an inclusive and integrated network of high-quality green and blue infrastructure, in line with the principles and standards of the Essex Green Infrastructure Strategy Standards (2022), or any subsequent strategy.<br>3. The appropriate tariff will be secured from qualifying residential developments within the Zones of Influence, as defined in the adopted Essex Recreational Disturbance Avoidance and Mitigation Strategy (RAMS), towards mitigation measures identified in the RAMS.<br>Other contributions will be sought in accordance with Policy INF1.<br>4. Unless exempt, development proposals must provide a minimum 10% biodiversity net gain above the existing ecological baseline value of the site, or any subsequent government standard. This must be calculated and reported in accordance with local and national best practice guidance prevailing at the time of the application and secured for a minimum of 30 years after completion.<br>5. Development is required to protect and enhance biodiversity through: | biodiversity impacts through the process of design development, and by embedding measures into the design of the **Project. ES Chapter 8: Ecology and Biodiversity [AS-026]** presents the assessment of the likely significant ecology and biodiversity effects that could result from the Project. The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats during the construction and operation (including maintenance) phases.<br>National Grid have taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. While every effort has been made to deliver the required biodiversity units on-site through replacement planting and on-site mitigation in the form of habitat creation and enhancement, given the scale and nature of the Project, this 10 % net gain is not fully achievable on-site. Off-site biodiversity units are therefore proposed to make up this deficit.<br>Biodiversity is not bound by Local Authority area and therefore off-site Biodiversity Net Gain (BNG) will be considered across the length of the Project. However as detailed within the **7.1 Biodiversity Net Gain Report [APP-299]**, the aim is to deliver a biodiversity legacy ideally in each of the three Counties crossed by the Project (Norfolk, Suffolk and Essex). Off-site BNG sites will be selected based on a range of factors including proximity to the Project, |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | 5.1 Demonstrating biodiversity enhancements that contribute to the objectives of the latest Basildon Council Local Biodiversity Action Plan;<br>5.2 Protecting and increasing the provision of trees by:<br>i. protecting all trees, including street trees ;<br>ii. incorporating native trees, wherever possible; and<br>iii. providing replacement trees,<br>including street trees, where the loss of or impact on trees in a development is considered acceptable.<br>5.3 The design of any new development will be expected to incorporate beneficial biodiversity features, including but not limited to: swift boxes, bat or bird boxes, swift, bat and bee bricks, passageways to prevent access to roadways, wildlife kerbs, and gaps in the bases of garden fences to facilitate the movement of native wildlife, or the creation and connection of wildlife corridors through landscaping or other means.<br>6. The Council, as a supporting authority, will work with the Responsible Authority (currently Essex County Council) to deliver the Essex Local Nature Recovery Strategy (LNRS), and development proposals will be required to have regard to the LNRS to support effective nature recovery.<br>7. Development must protect, conserve, and enhance the Boroughs landscape character and local distinctiveness in accordance with the Basildon Borough | geographical location, local nature recovery strategies, habitat type, habitat condition, cost and timings amongst others.<br>National Grid will consider projects that align with the LNRSs in the three counties that the Project is located within. It is seeking to purchase units that provide wider societal benefits and deliver Environmental Net Gain. It is likely that this will include projects that support the Essex Green Infrastructure Strategy. The Project is aware of several nature recovery projects that interact with its alignment and have sought to minimise the potential for negative effects. The Project design allows for future plans for nature recovery so that river restoration projects for example will be able to proceed without adverse effects to the Project or nature. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | Landscape Sensitivity Assessment 2025, Landscape Sensitivity Study (2025), and Green Belt Study (2025),<br>or any subsequent reviews. Proposals should maintain:<br>7.1 The landscapes historical, biodiversity, and cultural features, scenic quality, condition and tranquillity;<br>7.2 The distinctive setting of, and relationship between,<br>settlements, buildings, and the landscape, including important views, landmarks and the degree of openness;<br>7.3 The nature conservation value of the area, including<br>the composition, pattern, and extent of woodland, trees, field boundaries, vegetation and other features;<br>7.4 The recreational value of the landscape;<br>7.5 The special qualities of rivers, waterways, wetlands, and their surroundings; and<br>7.6 The existing topography including sensitive skylines, hillsides, and geological features.<br>8. The Council will seek the conservation and enhancement of Local Wildlife Sites (LoWS) and Local Geological Sites (LoGS) and will support proposals which ensure the active management and improvement of biodiversity and geodiversity interest at these sites.<br>9. The extents of the Local Wildlife Sites, Local Geological Sites, and Potential Local Wildlife Sites in | |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | the Borough are identified on the Policies Map. A schedule of the Local Wildlife Sites can be viewed in the Basildon Borough Local Wildlife Sites 2020 Register (2021). | |
| **Policy GB1; Protecting the Green Belt** | 1. The extent of the Green Belt is defined on the Policies Map.<br>2. Land designated as Green Belt will be protected against inappropriate development.<br>3. Where weight is to be given to the benefits of a proposal advanced under Very Special Circumstances, the Council will expect that the delivery of these benefits is shown to be viable and is secured by planning conditions or a legal agreement. | Paragraph 154 of the National Planning Policy Framework (NPPF) specifies that development in the Green Belt is generally considered inappropriate unless it satisfies defined exemptions. Paragraph 154(h)(ii) clarifies that engineering operations may be deemed appropriate, provided they preserve the openness of the Green Belt and do not conflict with its intended purposes. National Grid asserts that the overhead lines qualify as an "engineering operation" and should not be deemed inappropriate in the Green Belt, provided they preserve its openness and adhere to its designated purposes.<br>Notwithstanding the above, even if the overhead lines were considered to be inappropriate development (which is not accepted by the Applicant as set out in **5.6 Planning Statement [APP-085]**), it is nevertheless considered that there are very special circumstances which justify their acceptability. Paragraphs 7.3.497 to 7.3.537 of the **5.6 Planning Statement [APP-085]** consider the Project's compliance with Green Belt policy. The assessment concludes that the overhead line infrastructure should be considered to be an engineering operation and as such should not be regarded as inappropriate development in the Green Belt.<br>The **5.6 Planning Statement [APP-085]** details the Very Special Circumstances applicable in this instance to justify inappropriate development. In |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | addition, paragraph 4.2.17 of National Policy Statement EN-16 also confirms that '…the Secretary of State will take as a starting point that critical national priority infrastructure will meet the following, non-exhaustive, list of tests:<br>Where development within a Green Belt requires very special circumstances to justify development'.<br>Therefore, the current policy position outlined in NPS EN-1 and EN-5 affirms that the proposed power lines and substation meet CNP infrastructure, satisfying the test for requiring very special circumstances to justify development.<br>In this context, the precedent established by national policy takes precedence over local policy, as the reinforcement and improvement of electrical national infrastructure is deemed a matter of paramount importance at the national level. |
| **Policy GB2: New Development in the Green Belt** | 1. Within the Green Belt, inappropriate development (as set out in the NPPF) will not be approved except in very special circumstances.<br>2. Development will not be treated as inappropriate in the Green Belt if it meets an exception set out in paragraph 154 (a) (b) (e) or (h) of the NPPF 2024, and/or the terms of paragraph 155 of the NPPF 2024 and/ or meets one or more of the following exceptions:<br>2.1 Dwellings associated with an agricultural, forestry or rural based enterprise, provided the Council is satisfied that accommodation for one or more | The Project includes works within the Metropolitan Green Belt. The works within Basildon comprise the erection of standard height pylons. As outlined in Chapter 7 of the **Planning Statement [APP-085]**, National Grid considers that the proposed overhead line comprises an engineering operation and should therefore not be regarded as inappropriate development in the Green Belt provided that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.<br>Notwithstanding the above, even if the overhead lines were considered to be inappropriate development |

[6] Department for Energy Security and Net Zero (2024) *Overarching National Policy Statement for Energy (EN-1)*

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | workers to live at, or in the immediate vicinity of, their place of work is essential for the proper functioning of the enterprise.<br>Applicants must submit evidence to identify and confirm the need.<br>2.2 Limited affordable housing for local community needs under policies set out in the development plan, meeting the requirements set out in policy HOU2.The Council will assess applications based on:<br>i. whether there is clear evidence, supplied by the applicant, of need for the number and type of housing proposed within the Village or Parish; and<br>ii. whether the allocation is adjacent to a Defined Settlement Boundary and accessible to local services and facilities; and<br>iii. whether appropriate legal agreements are entered into to ensure that all dwellings will remain available for affordable housing, and exclusively for local need, in perpetuity, and that the necessary management of the scheme can be permanently secured; and<br>iv. whether there are any other overriding environmental or other planning constraints.<br>2.3 Limited infilling or the partial/ complete redevelopment of previously developed land | (which is not accepted by the Applicant as set out in **5.6 Planning Statement [APP-085]**), it is nevertheless considered that there are very special circumstances which justify their acceptability. Paragraphs 7.3.497 to 7.3.537 of the **5.6 Planning Statement [APP-085]** consider the Project's compliance with Green Belt policy. The assessment concludes that the overhead line infrastructure should be considered to be an engineering operation and as such should not be regarded as inappropriate development in the Green Belt.<br>The **5.6 Planning Statement [APP-085]** details the Very Special Circumstances applicable in this instance to justify inappropriate development. In addition, paragraph 4.2.17 of National Policy Statement EN-17 also confirms that '…the Secretary of State will take as a starting point that critical national priority infrastructure will meet the following, non-exhaustive, list of tests:<br>Where development within a Green Belt requires very special circumstances to justify development'. |

[7] Department for Energy Security and Net Zero (2024) *Overarching National Policy Statement for Energy (EN-1)*

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.<br>The Council will assess the development based on the following:<br>i. the size, scale, massing, and spread of the new development compared to the existing; the visual impact of the development compared to the existing;<br>ii. the activities/use of the new development compared to the existing; and iii. whether the location of the site is sustainable and appropriate to the type of development<br>proposed. Planning permission for the proposed developments in paragraphs 2, 2(a), 2(b) and 2(c) above (treated as not inappropriate in the Green Belt) will be granted where there are no other harms outweigh the grant of planning permission.<br>3. Replacement of a building in the Green Belt will be granted planning permission provided that:<br>3.1 the existing building being replaced is of permanent and sustainable construction, and is lawful;<br>3.2 the new building is in the same use as the existing; and<br>3.3 the new building is not materially larger than the one it replaces; and<br>3.4 the new building would not be out of keeping with its context and surroundings and does not result in any other harm. | |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | In accordance with NPPF paragraph 154 (d), a replacement building will not be treated as inappropriate development in the Green Belt provided that it is in the same use as the existing building and will not be materially larger than the one it replaces.<br>In respect of replacement of a building in the Green Belt, where very special circumstances are required to be demonstrated, and development is exceptionally permitted within the Green Belt, the Council will seek to remove permitted development rights for any further works to the proposed development or to works within its curtilage, where it is likely that further development would cause harm to the openness of the Green Belt.<br>4. In respect of limited infilling in villages, where development proposals are permitted as infill within the Green Belt, the Council will seek to remove relevant permitted development rights to ensure that extensions, alterations, and ancillary buildings would not result in the development causing harm to the character or the openness of the Green Belt.<br>5. For development proposals within plotland sites, the above paragraphs 1-4 are applicable as well as the design principles in policy D3. Additionally, the development will:<br>5.1 Be subject to design guidance in a forthcoming Plotlands Planning Document (SPD);<br>5.2 Provide contributions through a Community Infrastructure Levy regime (CIL) and, where appropriate, be secured by legal agreement. | |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| **Policy HE1: Conserving and Enhancing the Historic Environment** | 1. The Council will seek to protect, conserve, and enhance the Boroughs historic environment. This includes both designated and non-designated heritage assets and their settings, including Listed Buildings, historic structures, Conservation Areas, Scheduled Monuments, landscapes and archaeology.<br>2. Development proposals should be sensitively designed and should not cause harm to the historic environment. All development proposals which would have an impact on the historic environment, or any features of the historic environment, will be expected to:<br>2.1 Conserve or enhance, the significance, character, setting and local distinctiveness of the heritage asset and mitigate any adverse impacts;<br>2.2 Make a positive contribution to local character through high standards of design, which reflect and complement its significance, including through the use of appropriate materials and construction techniques; and 2.3 Ensure alterations, including those for energy efficiency and renewable energy, are balanced alongside the need to retain the integrity of the historic environment and to respect the character and significance of the asset.<br>3. Development within or affecting the setting of the Boroughs Conservation Areas, as defined on the Policies Map, including views in or out, should preserve or enhance the character or appearance of the Conservation Area.<br>Consideration must be given to the streetscape, plot and frontage sizes, materials and relationships | **ES Chapter 11: Historic Environment [AS-068]** reports the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets.<br>**ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets [APP-215]** found that the Project would not result in substantial harm to any heritage assets. Whilst the Project will not result in substantial harm to designated heritage assets **ES Chapter 11: Historic Environment [AS-068]** concludes it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting.<br>The substantial public benefits and need for the Project, as set out in Chapter 5 of the **Planning Statement [APP-085]**, including supporting the UK's net zero target, enabling the connection in East Anglia of new low carbon energy generation, and reinforcing the transmission network clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and the non-designated heritage assets of scheduled quality. This |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | between all existing buildings, structures, and spaces. Proposals should have particular regard to the special features and key characteristics identified within the relevant character appraisal and management plan for the Conservation Area.<br>4. Open spaces, trees and other hard and soft landscape features important to the character or appearance of the area should be retained or, if replaced or enhanced, still be in keeping with the character of the area.<br>5. Proposals for all new development, including alterations and extensions to buildings, their re-use and the incorporation of energy efficiency and renewable energy technologies, must be of a high quality and sensitive design.<br>6. Proposals to demolish buildings and/ or structures will be assessed against their contribution to the significance of the Conservation Area as a heritage asset. Where substantial harm would be caused to a Conservation Areas significance, the proposal will be resisted unless substantial public benefits outweighing any harm to the Conservation Area can be demonstrated. Where the harm would be less than substantial, it will be weighed against any public benefits of the proposal, including securing optimum viable use of the heritage asset.<br>7. For development proposals involving demolition, a programme of recording and understanding of the heritage asset which is to be affected will be expected as part of the development proposal and the recordings must be submitted for inclusion on the Essex Historic Environment Record. | is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | 8. Proposals for development, including change of use, that involve any alterations to a Listed Building or within its curtilage, will be supported where they:<br>8.1 Do not lead to substantial harm to, or total loss of, the significance of the building, including its setting;<br>8.2 Harmonise with the period, style, materials and detailing of the building;<br>8.3 Retain and repair existing features and fabric, or, if missing, replace them in a sympathetic manner;<br>8.4 Do not harm the structural integrity or stability of the<br>building, or that of adjoining buildings or structures; and<br>8.5 Relate sensitively to the significance of the building and do not adversely affect the internal or external appearance or character of the building, curtilage, or its setting.<br>9. Proposals affecting the significance of a Listed Building will be required to:<br>9.1 Be supported by a Heritage Statement carried out in accordance with Historic England guidelines, which demonstrate an understanding of the significance of the Listed Building and its setting by describing it in sufficient detail to determine its historic or architectural interest to a level proportionate with its importance;<br>9.2 Justify any harm proposed to the significance of the Listed Building and demonstrate the overriding public benefits which would outweigh the harm to the Listed Building or its setting. The greater the harm to | |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | the significance of the Listed Building, the greater justification and public benefit that will be required before the application could gain support; and<br>9.3 Minimise any identified harm or loss to the Listed Building through mitigation.<br>10. As a precautionary approach to ensuring that archaeological remains in the Borough are protected, the Council will require an appropriate desk-based archaeological assessment and, where necessary, a field evaluation where heritage assets of archaeological interest of any significance are or may be present on the site of a proposed development, or are likely to be affected by the proposed development. This assessment must form part of the planning application.<br>11. Scheduled Monuments and other important archaeological sites and their settings will be preserved in situ.<br>Mitigation measures must be taken to ensure the preservation of all remains of archaeological importance and to avoid harm being caused to the important archaeological remains if they are to be preserved in situ.<br>12. Development proposals affecting archaeological remains of less than national importance must be conserved in a manner appropriate to their significance.<br>13. If archaeological remains are to be impacted upon by development, a programme of excavation, recording, publication, and archiving of remains must be provided as part of the proposal. Evidence should be deposited with the Essex Historic Environment | |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | Record and any archives with a local museum or other public depository.<br>14. Proposals for development, including repairs, change of use, alterations, and extensions to a non-designated heritage asset (NDHA) will be supported where they are designed sensitively and sympathetically and do not adversely affect the significance of the asset.<br>15. Where a NDHA is directly or indirectly affected by development proposals, its significance should be retained within development wherever reasonably practicable. Where this is not practicable, consideration will be given to the scale of any harm to or loss of the heritage asset and to the significance of the heritage asset | |
| **Policy AQMP1: Mitigation Environmental Pollution** | To make sure that the natural environment, the quality of life and health and wellbeing of existing and future occupiers are not adversely affected by harmful pollutants and other negative impacts on the local environment, all development proposals must be located and designed to avoid significant adverse effects to the environment, and other sensitive receptors from pollution to land, air, water, or as a result of any form of disturbance.<br>Assessment should also include the cumulative impact of the developments on the wider area.<br>Developments sensitive to pollutants will be expected to demonstrate that the proposal would not result in unacceptable impacts on air quality, odour, noise, light or water generating uses. | The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce impacts and effects through the process of design development.<br>**ES Chapter 7: Air Quality [APP-147]** assesses the likely air quality effects that would result from the Project and considers the existing baseline conditions and the likely changes and effects to air quality levels during the construction phase. As set out in the **Scoping Report (APP-288 to APP-296) and agreed within the Scoping Opinion [APP-297]**, the operational phase of the Project will not result in any significant impacts to air quality and no further assessment has been carried out in the ES. The assessment confirms that with the implementation of the proposed standard mitigation measures, the effects of construction on air quality in regard to dust |

*Air Quality*

An Air Quality Assessment must be submitted as part of a planning application for major development proposals.

The Air Quality Assessment must outline the measures to mitigate any adverse effects during construction and operation, individually or cumulatively on neighbouring uses and how proposals have considered ways to maximise benefits to local air quality. The assessment must be compliant with relevant emissions standards and have full regard to the Essex Air Quality Strategy or succeeding documents.

Where development proposals would be subject to unacceptable air quality standards or would have an unacceptable impact on air quality standards they will be refused.

*Odour*

An Odour Impact Assessment will be required as part of a planning application for developments which release odours or when a sensitive use is being proposed near to an existing odorous process.

The application will be refused unless satisfactory mitigation measures can be applied.

*Noise*

A Noise Impact Assessment will be required as part of a planning application for noise sensitive and noise generating development. The application will be refused unless satisfactory mitigation measures can be applied.

*Light*

The Council will seek to limit light pollution from new development and proposals are expected to balance

soiling, and human health effects are anticipated to be not significant.

As identified in the **Statement of Statutory Nuisance [APP-083]** it is not anticipated that construction activities would give rise to any material amounts of steam, smell or other effluvia.

**ES Chapter 14: Noise and Vibration [APP-256]** presents the assessment of likely significant noise and vibration effects that could result from the Project.

The Project has been designed following the mitigation hierarchy, as far as practicable, in order to avoid or reduce noise and vibration impacts and effects.

The **Outline Code of Construction Practice [APP-300]** (Outline CoCP) sets out noise and vibration limits, monitoring protocols, and reporting requirements for all construction activities to minimise adverse impacts during the construction phase. The measures set out within **7.2 Outline CoCP [APP-300]** will be secured via Requirement 4(a) (Construction Management Plans) of **3.1 Draft DCO [APP-056]** within the final CoCP.. Noise levels from the overhead lines were scoped out of the noise and vibration assessment of the Project as levels of noise are likely to be low.

**ES Chapter 13: Landscape and Visual [APP-226]** presents the assessment of likely significant landscape and visual effects that could result from the Project. Regarding the assessment of lighting, the Landscape and Visual chapter has been based on the assumptions that:

A typical construction day will consist of 12-hours meaning in winter this would require working in the

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | necessary lighting for operational and security purposes with prevention of light spillage and the effect on both the local environment, including wildlife, and on nearby local residents and their health and well-being.<br>*Water Quality*<br>All proposals for development will be required to demonstrate that they will not have a negative impact on water quality through pollution of surface or ground water or the discharge and treatment of water originating from the development site. | dark at either end of the day. For the purposes of the ES, it is therefore assumed that winter working will require lighting at certain sites but will not be wide scale across the Project.<br>The **Outline CoCP [APP-300]** contains relevant good practice measures relating to Landscape and Visual. These measures include LV03: Construction lighting will be directional and minimised where possible.<br>**ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]** presents the assessment of likely significant water effects that could result from the Project. The construction of the Project has the potential to impact on water quality and resources associated with:<br>• Soil stripping and stockpiling and storage of soil<br>• Watercourse crossings<br>• Establishment and use of temporary construction compounds<br>Good practice measures described within the **Outline CoCP [APP-300]** would be in place during construction. These would safeguard water quality and avoid detrimental impacts to the flow regimes of watercourses.<br>The majority of CSE compounds, temporary construction compounds and substation works are not located near watercourses and other surface waterbodies. Therefore, there are no pathways for potential pollutants arising from construction activities at most locations, for example silted runoff, to reach surface water receptors. Where works near to these receptors cannot be avoided, the magnitude of the |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | potential effects on these watercourses would be reduced through the implementation of the good practice pollution prevention and water quality safeguarding measures. |
| **Policy AQMP4: Protecting High Quality Agricultural Land** | Agricultural Land Classification site surveys are required for major development proposals affecting agricultural land. Where land is classified as grade 3, the site survey must distinguish whether the land is grade 3a or 3b.<br>Development of the best and most versatile agricultural land (grades 1 to 3a) shall be avoided, unless it can be demonstrated to be the most sustainable choice from reasonable alternatives. | **ES Chapter 6: Agriculture and Soils [APP-138]** presents the assessment of likely significant effects that could result from the Project on soils, agricultural land and agricultural landholdings. The ES chapter is accompanied by **ES Figure 6.2: Provisional Agricultural Land Classification (ALC) Mapping [APP-142]** and **ES Figure 6.3: Detailed Agricultural Land Classification (ALC) Mapping [APP-143]** which illustrate that within Basildon the Project is routed around Grade 1, Grade 3a and 3b agricultural land.<br>During operation (and maintenance), there would be a permanent loss of areas of agricultural land required for permanent infrastructure. By the end of construction, all land required temporarily would be reinstated, and effects on agricultural operations during the construction phase would be managed through compensation agreements (which lie outside of the EIA process). The implementation of good practice measures would ensure that disruption is minimised, and combined with reinstatement and compensation agreements, it is therefore considered that the effects on agricultural landholdings would result in a neutral effect and would not be significant. |
| **Site Allocation H11: Land West of West Mayne** | *Vision*<br>Our vision for Land West of West Mayne (H11) is to create a sustainable, walkable neighbourhood that complements the emerging Dunton Garden Village. | National Grid responded to the Basildon Borough Council Local Plan Regulation 18 Consultation Part 3 on 16 January 2026 with comments on the Land West of Mayne allocation. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | The development will integrate new high quality homes with green infrastructure and active travel routes, encouraging connectivity between the two communities.<br>The masterplan will embed nature and heritage into the design, delivering a resilient, future-proofed neighbourhood supported by essential infrastructure and public spaces that foster social cohesion and environmental stewardship. | The Norwich to Tilbury Project interacts with the west of the proposed allocation with a 400kV overhead line and five new pylons. There are also construction access routes and the existing UKPN overhead line on the Site.<br>National Grid is seeking to engage with the developer promoting this site to ensure that a route to facilitate the construction and operation of the proposed transmission infrastructure is safeguarded.<br>Norwich to Tilbury have taken into consideration existing planning applications and also propose the 132kv diversion as cable in a manner that reduces the extent of interface won't affect the delivery of housing, new electricity transmission infrastructure and housing can coincide and coexist if designed sensitivity as referenced in National Grid's Design Guidelines for Development Near Pylons and High Voltage Overhead Power Lines. |
| **Site Allocation E5: Friern Manor Farm** | *Vision*<br>Our vision for Friern Manor Farm (E5) is to deliver high-quality employment development within the A127 corridor, supporting industrial and research based uses that contribute to Basildon's economic growth. It will accommodate uses within Classes B2, B8, and E(g), designed to complement nearby strategic employment areas and integrate sensitively with the surrounding landscape and heritage assets. | National Grid responded to the Basildon Borough Council Local Plan Regulation 18 Consultation Part 3 on 16 January 2026 with comments on the Land West of Mayne allocation.<br>The proposed Norwich to Tilbury Project interacts with the west of the proposed allocation with a<br>400kV overhead line and one pylon. There are also construction access routes which are proposed from West Mayne (B148).<br>The Norwich to Tilbury Project is proposing to install transmission infrastructure through this emerging allocation. National Grid have engaged with the developer promoting this site and continued |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | engagement with Basildon Borough Council to ensure that a route to facilitate the construction and operation of the proposed transmission infrastructure is safeguarded. |
| **Policy INF1: Infrastructure Delivery** | New developments will be expected to fully mitigate their impact on infrastructure, services, and the environment. Such mitigation may be secured through a planning obligation where it is not possible to secure it through planning conditions, subject to an obligation meeting the requirements of the relevant legislation and national policy.<br>The infrastructure necessary to support new development will be determined by the Council in conjunction with the relevant provider.<br>In the case of major development, phased delivery may be required, and later phases may be dependent on the infrastructure provision being in place. The Council will work in partnership with providers of infrastructure and services to facilitate the timely provision of infrastructure necessary to support sustainable development in the borough, and in addressing pressures from cross boundary development. | The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce adverse environmental impacts through the process of design development, and by embedding measures into the design of the Project. The **Planning Statement [APP-085]** explains how good design has been embedded in the project from the outset. The design evolution of the Project has been an iterative process.<br>The Project would:<br>• Protect the historic environment - In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets. **ES Chapter 11: Historic Environment [AS-068]** found that there would be medium to high adverse magnitude of impacts resulting in a temporary moderate adverse residual effect which is significant, due to changes in settings that affect the value of a number of designated heritage assets in Colchester (referred to as Section D in ES Chapter 11) during the construction phase of the Project. The assessment concludes that far less heritage assets would be impacted by the operational (and maintenance) phase of the Project. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | • Incorporate biodiversity creation and enhancement measures - National Grid has taken opportunities to provide mitigation and enhancement measures within the Order limits to increase biodiversity and provide overall net gains in habitat. The Project will deliver a minimum of 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project would deliver an overall net improvement in environmental value (including biodiversity) in the area through a combination of on-site and off-site mitigation. This is reported in the **Biodiversity Net Gain Report [APP-299].** There is currently no legislative requirement for Biodiversity Net Gain (BNG) in respect of infrastructure projects for which development consent is required.<br>• Provision of appropriate water and wastewater and flood mitigation measures - During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the **FRA [APP-331]**. Above ground structures such as pylons and below ground structures such as the underground cable are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. The **Outline CoCP [APP-300]** describes the good practice measures including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime.<br>• Protect the amenity of existing and future residents and users - Impacts of the Project on environmental conditions and neighbouring uses including approved development likely to come forward in the future is assessed in the ES Chapters and the associated assessment reports, see **ES Chapter 7: Air Quality [APP-147], ES Chapter 9: Contaminated Land, Geology and Hydrogeology [APP-181], ES Chapter 10: Health and Wellbeing [APP-192], ES Chapter 12: Hydrology and Land Drainage [APP-221], ES Chapter 13: Landscape and Visual [APP-226], ES Chapter 14: Noise and Vibration [APP-256], ES Chapter 16: Traffic and Transport [APP-271], ES Chapter 17: Cumulative Effects [APP-281]**. The assessment in the ES chapters has helped to underpin the embedded mitigation and additional mitigation measures needed to minimise significant adverse effects on the environment. The measures are set out in the **Outline CoCP [APP-300]** which, amongst other matters, provides measures for the control and reduction of impacts relating to noise, vibration, smell, loss of light, overbearing and overlooking. |
| **Policy INF2: Securing Infrastructure Contributions** | Where a development proposal is shown to require additional infrastructure capacity, mitigation measures must be agreed with the Local Planning | The Project is a National Significant Infrastructure Project and is exempt from developer contributions/CIL. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | Authority and the appropriate infrastructure provider. Such measures may include:<br>• On-site provision, or off-site capacity improvement works<br>• The provision of land.<br>• Financial contributions towards new or expanded facilities and associated maintenance<br>Where new development necessitates a highways, transport, education, or healthcare contribution, these will be sought in line with the latest advice or policy guidance from the relevant authorities.<br>Planning permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the necessary requirements arising from the proposed development. Development proposals must consider all of the infrastructure implications of a scheme; not just those on the site or its immediate vicinity.<br>Conditions or planning obligations, as part of a package or combination of infrastructure delivery measures, may be required to ensure that new development meets this principle. Consideration must be given to the likely timing of infrastructure provision. As such, development may need to be phased. Conditions or planning obligations may be used to secure this phasing arrangement<br>Developers may also be required to enter into obligations which provide for appropriate additional mitigation in the event that scheme viability improves prior to completion of the development. In negotiating planning obligations, the Council will account for | National Grid's commitment to providing 10% BNG will be secured through a unilateral undertaking given under s.106 of the Town and Country Planning Act 1990. While every effort has been made to deliver the required BNG through replacement planting and on-site mitigation in the form of habitat creation and enhancement, given the scale and nature of the Project, 10 % BNG is not fully achievable on-site. Off-site BNG is therefore proposed to make up any deficit. Biodiversity is not physically bound by planning authority boundaries and therefore a holistic approach is proposed for any off-site BNG, with the aim to deliver a biodiversity legacy ideally in each of the three counties crossed by the Project (Norfolk, Suffolk and Essex).<br>Offsite BNG will be delivered through collaboration with partners and purchased from commercially registered providers. National Grid has been engaging in productive discussions with Norfolk, Suffolk and Essex Wildlife Trusts regarding the provision of off-site BNG units for the Project.<br>National Grid has prepared draft Heads of Terms in relation to s106 Unilateral Undertaking. |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | local and strategic infrastructure needs, as well as being mindful of viability.<br>Where a development proposal cannot be made acceptable in planning terms through the use of planning conditions or planning obligations, the Council will refuse permission. | |
| **Thurrock Council Local Plan Review (Regulation 18 Consultation December 2023) Local Plan Initial Proposals** | | |
| **The Initial Proposals document sets out information about the suggested structure of the emerging Local Plan. It also includes information about initial proposals for how places in the borough might grow, change, and adapt over the next 15-20 years alongside a series of alternative options.** | Chadwell St. Mary | The Norwich to Tilbury routeing alignment in the Creating Successful Places: Initial Proposals document illustrates that our currently preferred route proposes an underground cable route between the Tilbury Substation and Mucking Heath, at which point the cables would transition to an overhead line continuing to the north. National Grid notes that at Chadwell St. Mary the initial proposals document includes provision for an area of accessible green infrastructure. Subject to further information regarding the detailed design of the green infrastructure area, including planting proposals, National Grid does not consider that there is any incompatibility between those uses and the proposed underground cables. National Grid would welcome the opportunity to remain involved in any emerging design proposals to ensure that any landscaping proposals take into account the routeing and protection of the proposed underground cables. |
| | Southfields Opportunity Area | Land at Southfields is identified as an Opportunity Area with the potential to deliver in the range of 1,250 to 1,750 new homes. National Grid had some engagement with the developer promoting this site prior to our 2023 non-statutory consultation to seek to |

| Local Policy Reference | Policy Wording | How the Project has had regard to Local Planning the Policy |
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| | | ensure that the development of their proposals was sympathetic to retaining a route to facilitate the construction, operation and future maintenance of the proposed transmission infrastructure. In identifying the routeing and alignment, National Grid has sought to minimise any direct impact on this proposed allocation by adopting a currently preferred alignment within the safety zone around the existing high pressure gas pipeline.<br><br>The proposed draft order limits for the Norwich to Tilbury project will be shared with Thurrock Council and the developer at Statutory Consultation stage as they are further refined with a view to seeking agreement for a safeguarded route through the emerging allocation which will accord with the rights to be sought through the Development Consent Order. |

## 1.7 Signposting for how the Project has had regard to Neighbourhood Plans (Emerging and Adopted Plans post 1 April 2025)

Table 1.13 Signposting with Neighbourhood Plan Policy

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
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| **Section A** | | | |
| Draft Swainsthorpe Neighbourhood Plan (Pre-Submission Draft December 2025) | Policy SWS1: Design | The design of all new development will reflect the local distinctiveness and character of the parish and seek to enhance its quality<br>When considering proposals for new development, irrespective of scale or use, proposals must demonstrate how the design of the proposal has been developed with regard to the Character Area analysis in the Swainsthorpe Design Guidance and Codes 2025.<br>d) **Landscaping and views:** Locally important views of the church from surrounding countryside and from the A140 to the north must be protected. Screening measures must be used, such as planting of trees and hedgerows, to mitigate the impact on the landscape or views of any development, including energy projects or industrial/commercial development. Any major changes to the landscape or view, which is temporary (for construction purposes) must be restored to its original or enhanced quality. Gaps between neighbouring tandem properties should<br>be wide enough to maintain views of the countryside. | Good design of electricity transmission infrastructure is primarily governed by application of the Holford and Horlock Rules, alongside an iterative design approach informed by stakeholder engagement, relevant sections of national policy (National Policy Statement (NPS) EN-1 and NPS EN-5 and the embedded environmental design mitigation as part of the Environmental Impact Assessment process.<br>Such good design principles are then intertwined with the technical design requirements alongside the regulatory and other constraints such as operational, safety and security requirements for new electricity transmission infrastructure.<br>NPS EN-1 and NPS EN-5 set out the requirement to deliver good design, and the Applicant has responded to the criteria by which it will be assessed, following the Holford Rules and the Horlock Rules, in developing the Project. |

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
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| | | | The Project team has sought to respond to the guidance to ensure that the Project is able to demonstrate that it adheres to good design through both process and outcomes. The **7.15 Design and Access Statement [APP-353]** sets out how the Project reflected the four principles of good design in the Planning Inspectorate's Advice on Good Design[8].<br>It is important to note that the design approach is also set within technical limitations to meet safety, security, cost effectiveness and operational requirements. These limit the scope for aesthetic or architectural customisation. Key elements like pylon size and substation layout are fixed by these functional needs.<br>**ES Chapter 13: Landscape and Visual [APP-226]** presents the assessment of the likely significant landscape and visual effects that could result from the Project.<br>Visual receptors are grouped into Visual Receptor Areas (VRAs) based on location, landscape characteristics, and similar views, as shown in **ES Figure 13.7: Visual Receptors and Viewpoints [APP-243].** VRAs and |

[8] Planning Inspectorate (2024) *Nationally Significant Infrastructure Projects: Advice on Good Design*

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
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| | | | representative viewpoints were identified through site surveys, desktop analysis, and Neighbourhood Plans. Visual effects of linear developments, like overhead lines, are assessed using representative viewpoints to capture typical views, following GLVIA3 guidelines for a proportionate and focused LVIA. Whilst important views have been considered, individual assessments from each identified location have not been presented in the LVIA.<br>The Visual Receptor Area assessment contained in the **Visual Baseline and Assessment [APP-227]**.<br>At Year 1 of operation, there would be significant adverse visual effects on visual receptors within most of the VRAs which are directly affected by the Project. |
| | Policy SWS4: Heritage | The historic significance of existing heritage assets in the parish, both designated and non-designated, will be protected.<br>Proposals for new development should ensure that its design complements the shape and form of the existing settlement pattern. The design should respect the setting of designated heritage assets and views of St Peter's Church.<br>The following are heritage assets that are considered to be locally important to Swainsthorpe in terms of their architectural, historical, or cultural significance. These will | **ES Chapter 11: Historic Environment [AS-068]** reports the assessment of the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with |

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
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| | | be treated as Non-designated Heritage Assets (shown in **figure 16**):<br>1) The Old School House, Ipswich Road<br>2) Ransome Old Smithy, Briar Lane<br>3) Milestone at A140/Church Road junction<br>4) The Old Rectory, 6 Church Road<br>5) New Village Sign 1996<br>6) 1920s Council Houses, 30-36 Church Road<br>7) New Tree Cottages, junction Briar Lane and the A140<br>8) Beehive Cottage, 28 Church Road<br>9) Church Farm, 6 Longbrooke Drive<br>10) Ivy House, 52 Church Road<br>11) Orchard Cottage, 58 Church Road<br>12) Violet Bank, 66 Church Road<br>13) The Vale, Church Road<br>14) The Granary, 45 Church Road<br>15) The Barn, 43 Church Road<br>16) The Croft, 60 Church Road | the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets.<br>Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting.<br>Within the Swainsthorpe Neighbourhood Plan Area the Project would result in a medium impact on the value of Glebe Farmhouse (Grade II Listed). |
| | Policy SWS5: Green Spaces | **Local Green Spaces**<br>The following existing green spaces within the parish are identified as Local Green Spaces (as shown on **figure 17**):<br>1) Village Green (including children's play area)<br>2) Millennium Green<br>3) Jubilee Garden<br>4) Churchyard<br>5) Green space at The Vale. | An assessment of the impact of the Project on open spaces (including playing fields) is included in the **Planning Statement [APP-085]**. The Project has taken a precautionary approach to the identification of potential open space. The Project Order Limits do follow the highway between the Green Space at The Vale. Works are proposed to underground an existing UKPN 11kV overhead line. These works would not |

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| | | Development within Local Green Spaces will be managed consistent with the approach taken to managing Green Belts.<br>**New green spaces**<br>The creation of new green spaces, such as informal amenity areas, play spaces and areas for dog walking, will be supported where they comply with other policies in this Neighbourhood Plan. | result in the permanent loss of this open space. |
| | Policy SWS6: Biodiversity | Proposals for new development will be expected to protect and enhance existing ecological networks, wildlife corridors and priority habitats and species.<br>Existing priority habitats, such as woodland areas and other features of biodiversity value within the parish, should be retained, and where practicable be incorporated into the design of new proposals. These include:<br>• Trees, both individual trees and narrow woodland belts.<br>• Hedgerows, including ancient hedgerows.<br>• Reed filled ditches.<br>• Ponds, including the existing network of waterbodies in the parish.<br>• Blocks of managed mixed deciduous woodland.<br>Development proposals must avoid the loss of trees and hedgerows. They must protect and enhance local habitats and wildlife corridors. New wildlife corridors should be designed and located to help increase movement between isolated populations.<br>Where loss or damage to a biodiversity feature is unavoidable, the benefits of the development must clearly outweigh the impacts and the development, shall provide for mitigation in the form of appropriate replacement or | **ES Chapter 8: Ecology and Biodiversity [AS-026]** assesses the potential impacts of the Project's construction, operation, and maintenance phases on ecological and biodiversity receptors. Habitat connectivity will be preserved where possible by utilising existing access routes, minimising working widths through biodiversity receptors, and maintaining connectivity via green corridors such as hedgerows and watercourses.<br>National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits The **Outline LEMP [AS-046]** refers to the retention, replacement planting and onsite habitat creation and enhancement of habitats in line with the **BNG Report [APP-299].**<br>The **Outline Code of Construction Practice (CoCP) [APP-300]** contains relevant measures relating to Ecology |

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
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| | | replanting, or creation of appropriate natural features on site, together with a method statement for the ongoing care and maintenance of that planting or feature, or, as a last resort, compensation measures will be sought. If suitable mitigation or compensation measures cannot be provided, planning permission will be refused.<br>Otherwise acceptable development proposals will be supported where they provide a minimum net gain of 10 per cent in biodiversity, moving towards an aspiration for 20 per cent, delivered on-site in the first instance through, for example the creation of new and the restoration and enhancement of existing natural habitats, e.g. ponds, hedgerows, wildflower meadows, new woodlands and the planting of additional trees and hedgerows.<br>Where biodiversity net gain is to be delivered via off-site habitat creation, this should preferably be delivered elsewhere in the parish and targeted at the proposed woodland opportunity areas and wildlife corridors (**figures 22 and 23**).<br>The design of all new development should connect existing landscape features and promote biodiversity through the planting of local trees, plants and hedgerows. Existing road verges should be enhanced to increase biodiversity and act as wildlife corridors of safe passage for wildlife; and development should provide bat, owl and bird boxes and bat friendly lighting to maintaining foraging routes. | and Biodiversity which demonstrate examples of where the Project will seek to identify opportunities for enhancement. These measures include but are not limited to:<br>• B12: Where temporary habitat removal is required to facilitate construction, this will be reinstated. Reinstatement will aim to provide habitats of equal or better value to those affected and permanent land take will be mitigated with additional habitat creation/ enhancement; minimum of 10 % BNG is being sought. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once re-established<br>• B201: The Project will seek to provide strategic habitat enhancement and creation, aiming to identify and implement opportunities to improve habitat quality and connectivity and align with national nature recovery objectives and projects. Such measures may include specific habitat creation and enhancement measures and |

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
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| | | | additional receptor -specific measures such as the creation of habitat piles and installation of bird and bat boxes. |
| | Policy SWS7: Flood Risk | All proposed development should be directed away from areas of the parish at highest risk of flooding from surface water (whether existing or future) as shown on **figure 27** and listed below:<br>1) Junction of Longbrooke Drive and Church Road<br>2) Junction of Briar Lane and the A140<br>3) Bridleway to Rookery Barn<br>4) Hickling Lane<br>5) The Vale<br>6) Bridleway from Church Road<br>7) Land to rear of Church Road<br>Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.<br>All new development, including minor development, is required to use appropriate sustainable drainage systems (commensurate with the size of the development proposed). These will mitigate and protect against pollution, provide drainage and wider amenity, recreational and biodiversity benefits.<br>Development will be expected to demonstrate (through the submission of a drainage strategy to accompany the submission of a planning application) how it will seek to achieve lower than greenfield run off rates, mitigate its own flooding and drainage impacts, whilst avoiding increases of flooding elsewhere. | Within Swainsthorpe, no permanent works are proposed within areas identified as being at risk from flooding.<br>**ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]** outlines the standard and additional mitigation measures relevant to hydrology, land drainage, and flood risk. These measures will be secured through the **Outline CoCP [APP-300]**. The **Outline CoCP [APP-300]** will be secured via a Requirement in the Development Consent Order (DCO), which mandates that the Main Works Contractor(s) prepare the CoCP substantially in accordance with the Outline CoCP to satisfy the Requirement. |

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
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| | Policy SWS8: Landscape Character and Important Public Local Views | Proposals for new development in the parish should take into account the distinctive landscape features and character of the landscape character type within which the proposal is located demonstrating how it has taken account of the specific guidance for that character type.<br>The following views and vistas within Swainsthorpe are identified as Important Public Local Views (**figure 30**):<br>1) St Peter's Church.<br>2) Entrance to the village, looking west towards St Peter's Church from Church Road.<br>3) From the end of Church View looking north across the fields.<br>4) View from the A140 looking east across to the Tas Valley both from The Sugar Beat Eating House and from Briar Lane across the new vineyard.<br>5) Church Farm from Church Road west of the village looking east across the fields.<br>6) View from the A140 /Hickling Lane looking south-west across the fields with the outline of St Peter's Church on the horizon.<br>7) View of the entrance to The Vale.<br>8) View of the bridleway beside Ivy House leading to Hickling Lane.<br>9) Views from Hickling Lane which runs east-west from the A140 to Gowthorpe Lane and forms part of the northern border of the Parish of Swainsthorpe.<br>Development proposals within or which would affect an important public local view should not detract from or have an adverse impact upon the landscape or character or any key features of these views. | **ES Chapter 13: Landscape and Visual [APP-226]** presents the assessment of the likely significant landscape and visual effects that could result from the Project.<br>Visual receptors are grouped into Visual Receptor Areas (VRAs) based on location, landscape characteristics, and similar views, as shown in **ES Figure 13.7: Visual Receptors and Viewpoints [APP-243]**. VRAs and representative viewpoints were identified through site surveys, desktop analysis, and Neighbourhood Plans. Visual effects of linear developments, like overhead lines, are assessed using representative viewpoints to capture typical views, following GLVIA3 guidelines for a proportionate and focused LVIA. Whilst important views have been considered, individual assessments from each identified location have not been presented in the LVIA.<br>The Visual Receptor Area assessment contained in the **Visual Baseline and Assessment [APP-227]**.<br>At Year 1 of operation, there would be significant adverse visual effects on visual receptors within most of the VRAs which are directly affected by the Project. |

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
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| | | Proposals for new buildings outside the Settlement Boundaries should be accompanied by a Landscape Visual Impact Assessment, or other appropriate and proportionate evidence, which demonstrates how the proposal can be accommodated in the countryside without having a significant detrimental impact, by reason of the buildings' scale, materials and location, on the key features of the views.<br>Any development which would have a significant adverse impact upon the landscape or character of the view concerned will not be supported. | The LVIA concludes that geographically widespread adverse landscape and visual impacts along the entire route of the proposed overhead line are entirely expected and unavoidable for a project of this nature. This is consistent with NPS EN-1 recognition that significant landscape and visual effects are unavoidable for all projects where new large-scale overhead line infrastructure passes through settled, rural landscape, particularly areas not influenced by existing overhead lines.<br>Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the LVIA study area, as illustrated on **6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240]**. There are also a high number of nationally designated landscapes, valued for their natural beauty, which have historically been designated despite the presence of transmission infrastructure.<br>The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be some significant effects on landscape character and visual amenity as reported in the LVIA |

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| | | | **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].** |
| | Policy SWS9: Mitigating the Impacts of Energy Projects | The impacts on the Neighbourhood Area of energy infrastructure projects and associated developments (e.g. renewable energy projects, interconnectors, pylons, overhead wires, converter stations, pipelines etc.), including the cumulative impacts from multiple schemes, should be given significant weight in the determination of such schemes.<br>The sensitivity to change of the relevant landscape character type should be given significant weight in the determination of proposals. This could include the prominence and appearance of the scheme.<br>Where works take place which have temporary impacts, the emphasis should be on timely restoration once works have been completed.<br>Where mitigatory or compensatory measures are identified which are considered necessary to remedy the permanent or long-term impacts of energy schemes on the landscape, natural environment, wildlife and nature recovery, historic<br>environment or the residential amenity for the parish, these should be provided in the first instance directly where those impacts are most felt.<br>Only if this is not possible or practicable should they be provided elsewhere in the parish. Where such mitigations are required in respect of biodiversity, the standard biodiversity net gain metric of 10% should be applied. | The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce environmental impacts through the process of design development, and by embedding measures into the design of the Project.<br>Good design of electricity transmission infrastructure is primarily governed by application of the Holford and Horlock Rules, alongside an iterative design approach informed by stakeholder engagement, relevant sections of national policy (National Policy Statement (NPS) EN-1 and NPS EN-5 and the embedded environmental design mitigation as part of the Environmental Impact Assessment process.<br>Such good design principles are then intertwined with the technical design requirements alongside the regulatory and other constraints such as operational, safety and security requirements for new electricity transmission infrastructure.<br>NPS EN-1 and NPS EN-5 set out the requirement to deliver good design, and the Applicant has responded to the |

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
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| | | | criteria by which it will be assessed, following the Holford Rules and the Horlock Rules, in developing the Project. The Project team has sought to respond to the guidance to ensure that the Project is able to demonstrate that it adheres to good design through both process and outcomes. The **7.15 Design and Access Statement [APP-353]** sets out how the Project reflected the four principles of good design in the Planning Inspectorate's Advice on Good Design .<br>It is important to note that the design approach is also set within technical limitations to meet safety, security, cost effectiveness and operational requirements. These limit the scope for aesthetic or architectural customisation. Key elements like pylon size and substation layout are fixed by these functional needs.<br>**ES Chapter 13: Landscape and Visual [APP-226]** presents the assessment of the likely significant landscape and visual effects that could result from the Project. The LVIA recognises that there will be significant landscape and visual effects of the Project during its construction and operation (and maintenance). |

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
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| | | | Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the LVIA study area, as illustrated on **6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240]**. There are also a high number of nationally designated landscapes, valued for their natural beauty, which have historically been designated despite the presence of transmission infrastructure.<br>The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be some significant effects on landscape character and visual amenity as reported in the LVIA **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].**<br>National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits The **Outline LEMP [AS-046]** refers to the retention, replacement planting and onsite habitat creation and enhancement of habitats in line with the **BNG Report [APP-299].** |
| **Newton Flotman Neighbourhood** | Policy NF9: | The Plan seeks to conserve and enhance the natural assets in the Plan area that are valued by the Newton | **ES Chapter 8: Ecology and Biodiversity [AS-026]** assesses the |

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| **Plan (Adopted October 2025)** | Natural Assets and Biodiversity | Flotman community. These assets are listed at paragraph 8.3 and are shown on figures 31 and 32. Enhancing biodiversity As appropriate to their scale, nature and location, development proposals should retain existing features of biodiversity value (including hedgerow and field margins, trees, veteran trees, grass verges, ancient grasslands, ponds and drainage ditches). Proposals for new development in the Plan area that are required to secure Biodiversity Net Gain, in line with national policy and the requirements set out in Policy 3 of the adopted Greater Norwich Local Plan, should seek to secure at least a 10% gain in biodiversity compared to the existing situation. Examples of enhancements to the biodiversity of the Plan area can include the following:<br>a) The creation of new natural habitats and improvements to, or connections between fragments of habitats identified above.<br>b) The planting of additional native trees and hedgerows, for screening and landscaping purposes.<br>c) Green areas between and in new developments.<br>d) Soft site boundaries to new developments where adjacent to agricultural land, open spaces or settlement edge, through native hedgerows.<br>e) Integrated bird boxes and bat boxes on the site. Loss of natural asset Where there is loss or damage, as a result of development, the proposal shall provide for appropriate replacement planting or appropriate natural features on site together with a method statement for the ongoing care and maintenance of that planting. Where this approach is not practicable, appropriate off-site mitigation/compensation should be incorporated into the development proposal. In either case, a method | potential impacts of the Project's construction, operation, and maintenance phases on ecological and biodiversity receptors. Habitat connectivity will be preserved where possible by utilising existing access routes, minimising working widths through biodiversity receptors, and maintaining connectivity via green corridors such as hedgerows and watercourses.<br>National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits The **Outline LEMP [AS-046]** refers to the retention, replacement planting and onsite habitat creation and enhancement of habitats in line with the **BNG Report [APP-299].**<br>The **Outline Code of Construction Practice (CoCP) [APP-300]** contains relevant measures relating to Ecology and Biodiversity which demonstrate examples of where the Project will seek to identify opportunities for enhancement. These measures include but are not limited to:<br>• B12: Where temporary habitat removal is required to facilitate construction, this will be reinstated. Reinstatement will aim to provide habitats of equal or better value to |

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| | | statement for the ongoing care and maintenance of the planting should be included in the proposal. | those affected and permanent land take will be mitigated with additional habitat creation/ enhancement; minimum of 10 % BNG is being sought. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once re-established<br>• B201: The Project will seek to provide strategic habitat enhancement and creation, aiming to identify and implement opportunities to improve habitat quality and connectivity and align with national nature recovery objectives and projects. Such measures may include specific habitat creation and enhancement measures and additional receptor -specific measures such as the creation of habitat piles and installation of bird and bat boxes. |
| | Policy NF11: Important local views | All proposals for new development in the Plan area should take into account the landscape setting of the development site and any identified important local views within the area of the site, which might be affected by the development. The following views are identified as important in Newton Flotman parish (figure 34 and 35): | **ES Chapter 13: Landscape and Visual [APP-226]** presents the assessment of the likely significant landscape and visual effects that could result from the Project. The LVIA recognises that there will be significant landscape and visual |

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| | | 1) From Cranes Farm looking north.<br>2) From track near Barley View looking towards Poringland.<br>3) From Ipswich Road looking south towards St. Mary's Church.<br>4) From Newton Flotman Village Centre site looking southwest.<br>5) From the Old Bridge off A140 looking along Old Street.<br>Development proposals within or affecting an important local view should demonstrate how they have responded positively to the view concerned and safeguarded its integrity and local importance. | effects of the Project during its construction and operation (and maintenance).<br>Visual receptors are grouped into Visual Receptor Areas (VRAs) based on location, landscape characteristics, and similar views, as shown in **ES Figure 13.7: Visual Receptors and Viewpoints [APP-243].** VRAs and representative viewpoints were identified through site surveys, desktop analysis, and Neighbourhood Plans.<br>Within Newton Flotman the relevant viewpoints for the Project are<br>• Viewpoint 1.05 Holly Lane, Hapton (Figure 7.12.F5) (APP342-351)<br>• Viewpoint 1.17 Grove Lane / Boudicca Way, near Tasburgh Hill Fort (Figure 7.12.F17) (APP342-351)<br>• Viewpoint 1.04 Long Lane, Flordon (Figure 7.12.F4) (APP342-351)<br>• Heritage Viewpoint HE1 Flordon Hall (Figure 7.12.F206) (APP342-351).<br>During construction the magnitude and level of effect would be as follows:<br>• Within 0.5 km the scale of change would be large and the magnitude of effect would be high. The effect would be major and significant (adverse) |

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| | | | • Between 0.5 km and 1.5 km the scale of change would be medium and the magnitude of effect would be medium. The effect would be moderate and significant (adverse)<br>• Beyond 1.5 km the scale of change would be small and the magnitude of effect would be low. The scale of change would reduce to barely perceptible along the floor of the Tas Valley, at Rainthorpe Hall and at Shotesham Hall and the magnitude of effect would be barely perceptible. The effect would be minor and not significant (adverse) overall, reducing to negligible and not significant along the floor of the Tas Valley.<br>At Year 1 of operation, there would be significant adverse visual effects on visual receptors within most of the VRAs which are directly affected by the Project.<br>The LVIA concludes that geographically widespread adverse landscape and visual impacts along the entire route of the proposed overhead line are entirely expected and unavoidable for a project of this nature. This is consistent with NPS EN-1 recognition that significant landscape and visual effects are unavoidable for all projects where new |

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| | | | large-scale overhead line infrastructure passes through settled, rural landscape, particularly areas not influenced by existing overhead lines.<br>Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the LVIA study area, as illustrated on **6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240]**. There are also a high number of nationally designated landscapes, valued for their natural beauty, which have historically been designated despite the presence of transmission infrastructure.<br>The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be some significant effects on landscape character and visual amenity as reported in the LVIA **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].** |
| | POLICY NF13: Localised flooding | Development proposals within the immediate locality of the areas identified below as having surface water drainage issues, should take account of all relevant evidence of flooding. Development must not cause or contribute to new flooding or drainage issues and should mitigate its own flooding and drainage impacts. There are a number of | Within Newton Flotman, no permanent works are proposed within areas identified as being at risk from flooding.<br>**ES Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]** outlines the standard and additional |

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| | | locations that have surface water drainage issues. The following locations within the parish (figure 38) are identified:<br>1) Joy Avenue<br>2) Dell Close<br>3) Church Road<br>4) St Mary's Close down to the bus stop<br>5) Alan Avenue, onto Flordon Road<br>6) Flordon Road coming off field track<br>7) Waterside Gardens All new development including minor development, is required to use an appropriate Sustainable Drainage System (SuDS) which will mitigate and protect against pollution, provide drainage and wider amenity, recreational and biodiversity benefits commensurate with the size of the development (see Newton Flotman Design Guidance and Codes). | mitigation measures relevant to hydrology, land drainage, and flood risk. These measures will be secured through the **Outline CoCP [APP-300].** The **Outline CoCP [APP-300]** will be secured via a Requirement in the Development Consent Order (DCO), which mandates that the Main Works Contractor(s) prepare the CoCP substantially in accordance with the Outline CoCP to satisfy the Requirement. |
| **Section C** | | | |
| **Draft Hintlesham & Chattisham Neighbourhood Plan Area (August 2025)** | Policy H&C 5 - Protecting Landscape Character | To conserve the essential landscape, heritage and rural character of the Neighbourhood Plan Area, development proposals shall, proportionate to the proposal demonstrate:<br>i. how the landscape characteristics of the site and its vicinity have informed the design of the proposal; and<br>ii. how the proposal has regard to, conserves and enhances, the rural and landscape character and the setting of the built-up areas of the parish, having regard to Joint Babergh and Mid Suffolk Landscape Guidance 2015 or any successor documents.<br>Proposals for new buildings outside the Settlement Boundaries will be required to be accompanied by a | The Project is Critical National Priority Infrastructure as defined in National Policy Statement EN-1 and is essential to ensure the existing transmission network will have sufficient capacity for the new renewable energy that is expected to connect to the network over the next ten years and beyond.<br>The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce adverse environmental impacts through the process of design development, and by |

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| | | Landscape and Visual Impact Assessment, or other appropriate and proportionate evidence, that demonstrates how the proposal can be accommodated in the countryside without having a significant adverse impact, by reason of the buildings scale, materials and location, on the character and appearance of the countryside and its distinction from the built-up area. | embedding measures into the design of the Project.<br>**ES Chapter 13: Landscape and Visual [APP-226]** presents the assessment of likely significant landscape and visual effects that could result from the Project. To inform the assessment a number of viewpoints have been identified along the route of the Project. The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. The viewpoints were discussed and agreed with relevant Local Planning Authorities, as set out in the relevant **Statements of Common Ground (5.9.1 – 5.9.12 [APP-089 to APP-100])**.<br>The LVIA concludes that geographically widespread adverse landscape and visual impacts along the entire route of the proposed overhead line are entirely expected and unavoidable for a project of this nature. This is consistent with NPS EN-1 recognition that significant landscape and visual effects are unavoidable for all projects where new large-scale overhead line infrastructure passes through settled, rural landscape, particularly areas not influenced by existing overhead lines. |

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| | | | Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the LVIA study area, as illustrated on **6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240]**. There are also a high number of nationally designated landscapes, valued for their natural beauty, which have historically been designated despite the presence of transmission infrastructure.<br>The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be some significant effects on landscape character and visual amenity as reported in the LVIA **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].** |
| | Policy H&C 6 – Biodiversity and Habitats | Development proposals should avoid the loss of, or significant harm to, priority habitats. Where such losses or harm are unavoidable, adequate mitigation measures or, as a last resort, compensation measures will be sought. If suitable mitigation or compensation measures cannot be provided, then planning permission should be refused. Where new access is created, or an existing access is widened through an existing hedgerow, a new hedgerow of native species shall be planted on the splay returns into the site to maintain the appearance and continuity of | **ES Chapter 8: Ecology and Biodiversity [AS-026]** assesses the potential impacts of the Project's construction, operation, and maintenance phases on ecological and biodiversity receptors. Habitat connectivity will be preserved where possible by utilising existing access routes, minimising working widths through biodiversity receptors, and |

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
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| | | hedgerows in the vicinity. Otherwise, acceptable development proposals will only be supported where they provide a measurable net gain in biodiversity through, for example:<br>a) The creation of new natural habitats including ponds, hedgerows and natural boundary treatments;<br>b) The planting of additional native trees and hedgerows of local provenance (reflecting the character of the Neighbourhood Area's ancient woodland and hedgerows); and<br>c) Restoring and repairing fragmented biodiversity networks. In addition to the statutory requirements, development will be supported where it incorporates provision within dwellings for measures including swift bricks, bat boxes and holes in fences which allow access for hedgehogs. | maintaining connectivity via green corridors such as hedgerows and watercourses.<br>The Project aims to deliver a 10% net gain in biodiversity which requires off site biodiversity units to be purchased. National Grid will consider projects that align with the LNRSs in the three counties that the Project is located within. It is seeking to purchase units that provide wider societal benefits and deliver Environmental Net Gain. The Project is aware of several nature recovery projects that interact with its alignment and have sought to minimise the potential for negative effects. The Project design allows for future plans for nature recovery so that river restoration projects for example will be able to proceed without adverse effects to the Project or nature.<br>The **Outline Code of Construction Practice (CoCP) [APP-300]** contains relevant measures relating to Ecology and Biodiversity which demonstrate examples of where the Project will seek to identify opportunities for enhancement. These measures include but are not limited to:<br>• B12: Where temporary habitat removal is required to facilitate construction, this will be reinstated. |

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
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| | | | Reinstatement will aim to provide habitats of equal or better value to those affected and permanent land take will be mitigated with additional habitat creation/ enhancement; minimum of 10 % BNG is being sought. Accordingly, hedgerows scheduled for removal will be reinstated and, where appropriate, be improved from their baseline condition e.g., defunct, or species-poor hedgerows will be replanted to achieve species-rich and continuous hedgerows, once re-established<br>• B201: The Project will seek to provide strategic habitat enhancement and creation, aiming to identify and implement opportunities to improve habitat quality and connectivity and align with national nature recovery objectives and projects. Such measures may include specific habitat creation and enhancement measures and additional receptor -specific measures such as the creation of habitat piles and installation of bird and bat boxes. |
| | Policy H&C 7 - Important Views | Important views from public vantage points either within the built-up area or into or out of the surrounding countryside, are identified on the Policies Map. Any proposed development should not detract from the key | **ES Chapter 13: Landscape and Visual [APP-226]** presents the assessment of likely significant landscape and visual effects that could result from the Project. |

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
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| | | landscape features of these views. Proposals for new buildings outside the Settlement Boundaries should be accompanied by a Landscape and Visual Impact Assessment, or other appropriate and proportionate evidence, that demonstrates how the proposal can be accommodated in the countryside without having a significant detrimental impact, by reason of the buildings' scale, materials and location, on the key features of the views. | **ES Chapter 13: Landscape and Visual [APP-226]** highlights the baseline condition (Section 13.5) of landscape characters and visuals referring to the sections of the Project that they are located.<br>The LVIA concludes that geographically widespread adverse landscape and visual impacts along the entire route of the proposed overhead line are entirely expected and unavoidable for a project of this nature. This is consistent with NPS EN-1 recognition that significant landscape and visual effects are unavoidable for all projects where new large-scale overhead line infrastructure passes through settled, rural landscape, particularly areas not influenced by existing overhead lines. |
| | Policy H&C 8 - Local Green Spaces | The following Local Green Spaces are designated in this Plan and are identified on the Policies Map:<br>1) Hintlesham Recreation Ground and Play Area<br>2) Hintlesham Allotments<br>3) Hintlesham Churchyard<br>4) Timperleys Open Space<br>5) Chattisham Play Area<br>6) Chattisham Churchyard<br>7) Green at entrance to Chattisham Church<br>8) Church Belt Community Woodland | An Open Space Assessment has been prepared and reported in **Appendix B Open Space Assessment of the Planning Statement [APP-085]**. Open Space is defined in National Policy Statement EN-1 as including green and blue infrastructure. The Project has sought to avoid areas of open space, including green and blue infrastructure.<br>The Project does not interact with the Local Green Spaces identified in Policy H&C8. |

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
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| | | Development in the local green spaces will be consistent with national policy for the Green Belt. | |
| | Policy H&C 9 – Chattisham Special Character Area | A Special Character Area is identified on the Policies Map. Within the Special Character Area, as well as having regard to the need to preserve or enhance the significance of the heritage assets in or adjoining the area, development proposals should respond positively to the distinctive characteristics of the identified area as illustrated on Map 8. Development proposals which would cause unacceptable harm to the character and appearance of the Special Character Area will not be supported. | **ES Chapter 11: Historic Environment [AS-068]** reports the assessment of the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets.<br>Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting.<br>**ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets [APP-215]** found that the Project would not result in substantial harm to any heritage assets within the Special Character Area (including Church of All |

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
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| | | | Saints (Grade II* Listed) and Cartshead (Grade II Listed)). Due to screening by mature vegetation and buildings, the Project would only be occasionally visible. |
| **Copdock and Washbrook** (adopted 5 August 2025) | Policy C&W 7 - Area of Local Landscape Sensitivity | Development proposals in the Area of Local Landscape Sensitivity, as identified on the Policies Map, will be permitted only where they:<br>i. protect and, wherever possible enhance, the special landscape qualities of the area, as identified in the Landscape Appraisal; and<br>ii. are designed and sited so as to harmonise with the landscape setting of the site; and<br>iii. provide, satisfactory landscape impact mitigation measures as part of the proposal. | The Project does interact with the Area of Landscape Sensitivity at pylons JC17 and JC18.<br>The full assessment of the potential residual effects of the Project on landscape and visual amenity is contained in **ES Chapter 13: Landscape and Visual [APP-226] and ES Appendix 13.2: Landscape Baseline and Assessment [APP-228]**, **ES Appendix 13.3: Visual Baseline and Assessment [APP-229 to APP-232] and ES Appendix 13.4: Residential Visual Amenity Assessment [APP-233 to APP-234].** The landscape and visual amenity assessments indicate that the construction phases would result in significant negative landscape and visual amenity effects during construction. These significant effects are related to the introduction of construction activity and equipment, including the loss of some landscape features including farmland and field boundary vegetation. At Year 15 of operation, following the maturation of |

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
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| | | | mitigation planting, the assessment concludes that significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure projects, as set out in Paragraphs 5.10.5 and 5.10.13 of NPS EN-1. |
| | Policy C&W 9 - Biodiversity | Development should avoid the loss of, or substantial harm to, mature or veteran or hedgerow trees,<br>or other trees of importance to the landscape setting, hedgerows and other natural features such as ponds. Where such losses or harm are unavoidable adequate mitigation measures or, as a last resort, compensation measures will be sought. If suitable mitigation or compensation measures cannot be provided, then planning permission should be refused. Any planting shall not negatively impact visibility splays or cause a significant maintenance burden for the Highway Authority. Where new access is created, or an existing access is widened through an existing hedgerow, a new hedgerow of native species shall be planted on the splay returns into the site to maintain the appearance and continuity of hedgerows in the vicinity. Otherwise acceptable development proposals will be supported where they provide a net gain in biodiversity through, for example:<br>i. the creation of new natural habitats including ponds; | **ES Chapter 8: Ecology and Biodiversity [AS-026]** presents the assessment of the likely significant ecology and biodiversity effects that could result from the Project. The Project avoids and/or mitigates all long-term significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats during the construction and operation (including maintenance).<br>Vegetation removal will be required where the Project oversails the Belstead Brook.<br>The Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity impacts through the process of design development, and by |

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
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| | | ii. the planting of additional trees and hedgerows (reflecting the character of the areas traditional hedgerows), and;<br>iii. restoring and repairing fragmented biodiversity networks | embedding measures into the design of the Project. **ES Chapter 8: Ecology and Biodiversity [AS-026]** concludes there will be some temporary impact associated with the construction phase to both statutory designated sites and non-statutory designed sites. These temporary impacts will be mitigated through the standard mitigation measures set out in the **Outline CoCP [APP-300]** which will remove potential significant effects associated with dust, noise and hydrological effects on most statutory designated sites within the Study Area.<br>Where the construction phase results in temporary habitat damage or loss the habitat will be reinstated post-construction ensuring there would be no long-term adverse impact. Some of the woodland habitats cannot be replaced due to safety clearances and therefore, mitigation in the form of compensation planting is proposed. |
| | Policy C&W 11 - Protection of Important Views and Landscape Character | Important views from public vantage points either within the built-up area or into or out of the surrounding countryside, are identified on the Policies Map and described in Appendix 1.<br>Any proposed development should not detract from the key landscape features of these views. Proposals for new buildings | The full assessment of the potential residual effects of the Project on landscape and visual amenity is contained in **ES Chapter 13: Landscape and Visual [APP-226] and ES Appendix 13.2: Landscape Baseline and Assessment [APP-228], ES Appendix 13.3: Visual Baseline** |

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
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| | | outside the Settlement Boundary will be required to be accompanied by a Landscape Visual Impact Appraisal or other<br>appropriate and proportionate evidence that demonstrates how the proposal:<br>i. can be accommodated in the countryside without having a significant detrimental impact, by reason of the buildings scale, materials and location, on the character and appearance of the countryside and its distinction from the main built-up areas as identified by the Settlement Boundaries; and<br>ii. conserves and enhances the unique landscape and scenic beauty within the parish, having regard to the Neighbourhood Plan Landscape Appraisal. | **and Assessment [APP-229 to APP-232] and ES Appendix 13.4: Residential Visual Amenity Assessment [APP-233 to APP-234]**. The landscape and visual amenity assessments indicate that the construction phases would result in significant negative landscape and visual amenity effects during construction. These significant effects are related to the introduction of construction activity and equipment, including the loss of some landscape features including farmland and field boundary vegetation. At Year 15 of operation, following the maturation of mitigation planting, the assessment concludes that significant adverse landscape and visual effects would remain. This aligns with the expectation that adverse landscape and visual effects may be minimised but cannot be entirely avoided in virtually all nationally significant energy infrastructure projects, as set out in Paragraphs 5.10.5 and 5.10.13 of NPS EN-1. |
| | Policy C&W 12 – Heritage Assets | To ensure the conservation and enhancement of the village's designated heritage assets, proposals must: i. preserve or enhance the significance of the designated heritage assets of the village, their setting and the wider built environment, including views into, within and out of the village as identified on the Policies Map; | **ES Chapter 11: Historic Environment [AS-068]** reports the assessment of the assessment of the likely significant cultural heritage effects that could result from the Project. National Grid has undertaken an iterative design process |

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
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| | | i. retain buildings and spaces, the loss of which would cause harm to the character or appearance of the surrounding area;<br>ii. contribute to the village's local distinctiveness, built form and scale of its heritage assets, as described in the Landscape Appraisal and the AECOM Design Guidelines, through the use of appropriate design and materials;<br>iii. be of an appropriate scale, form, height, massing, alignment and detailed design which respects the area's character, appearance and its setting, in line with the AECOM Design Guidelines;<br>iv. demonstrate a clear understanding of the significance of the asset and of the wider context in which the heritage asset sits, alongside an assessment of the potential impact of the development on the heritage asset and its context; and<br>v. provide clear justification, through the submission of a heritage statement, for any works that could harm a heritage asset yet be of wider substantial public benefit, through detailed analysis of the asset and the proposal. Proposals will not be supported where the harm caused as a result of the impact of a proposed scheme is not justified by the public benefits that would be provided. Where a planning proposal affects a heritage asset, it must be accompanied by a Heritage Statement identifying, as a minimum, the significance of the asset, and an assessment of the impact of the proposal on heritage assets. The level of detail of the Heritage Statement should be proportionate to the importance of | which responds to policy requirements, published historic landscape character assessments and fieldwork analysis, in order to avoid and minimise harm to the historic environment. In accordance with the mitigation hierarchy, the Project design has been carefully considered to avoid, reduce or mitigate potentially significant adverse effects on cultural heritage and archaeological assets.<br>Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting.<br>**ES Appendix 11.7: Assessment of Harm to Designated Heritage Assets [APP-215]** found that the Project would not result in substantial harm to any heritage assets within the Neighbourhood Plan Area including the Church of St. Mary (Grade II* listed). At assessment presented in ES Appendix 11.7 during the construction phase, works associated with the Project would be partially within the setting of the Church of St. Mary (identified as high value asset). However, due to screening by mature vegetation in the asset's graveyard and the intervening |

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
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| | | the asset, the works proposed and sufficient to understand the potential impact of the proposal on its significance and/or setting. | landscape, the Project would only be occasionally visible. The Project would result in a small change to the setting of the asset, but due to the partial screening, there would be a low impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm.<br>During Operation it was assessed that as the Project is located largely in neighbouring parishes at the limit of the asset's setting, and due to some screening by mature vegetation and buildings, the Project would only be occasionally visible. The Project would result in a small change to the setting of the asset, but due to overall distance and the partial screening, there would be a negligible impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. |
| | Policy C&W 14 - Sustainable Construction Practices | This policy only applies to non-residential development.<br>Proposals that incorporate current best practice in energy conservation will be supported wheresuch measures are designed to be integral to the building design and minimise any detrimental impact on the building or its surroundings. Development proposals should demonstrate how they:<br>i. maximise the benefits of solar gain in site layouts and orientation of buildings; | Project would support the UK's net zero target to achieve net zero emissions by 2050 through the connection in East Anglia of new low carbon energy generation, and by reinforcing the transmission 4.1, **[APP-131]**) has been prepared in support of the Project. This identifies the carbon dioxide equivalent emissions that would be released during |

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
|---|---|---|---|
| | | ii. incorporate best practice in energy and water conservation and be designed to achieve maximum achievable energy and water efficiency;<br>iii. avoid installing new fossil fuel-based heating systems;<br>iv. incorporate sustainable design and construction measures and energy efficiency measures including, where feasible, ground/air source heat pumps, solar panels; and<br>v. incorporate measures to manage surface water run-off, and manage water resources sustainably in a manner that will deliver net-positive benefits to the wider area. These could include sustainable drainage systems where easily accessible maintenance can be achieved such as wetland and other water features which can help reduce flood risk whilst offering other benefits including water quality, amenity/ recreational areas, and biodiversity benefits; and rainwater/stormwater harvesting and greywater recycling to reduce potable water use | the construction and operation of the Project. The assessment concludes that the construction and operational CO2e numbers are not considered to have a material impact on the ability of the Government to meet its carbon reduction targets and therefore are not significant. Therefore, the operational, medium to long term benefits of delivering the Project on a national level are considered to outweigh any short-term impacts of greenhouse gas (GHG) emissions because of material use and construction activities.<br>the Project is supported by an Outline Site Waste Management Plan – **Appendix B of the CoCP [APP-302]** which sets out project-specific measures that will be employed to reduce the consumption of raw materials and to use the mitigation hierarchy for waste as part of reducing waste sent to landfill.<br>During the operation of the Project, there would be low risk of fluvial flooding and there would be no increase in flood risk as a consequence of the Project's operation, subject to implementation of the recommended compensatory storage described in the **FRA [APP-331]**. Above ground structures such as pylons and below ground structures |

| Neighbourhood Plan | Policy | Policy Requirement | How the Project has had regard to Neighbourhood Plan Policies |
|---|---|---|---|
| | | | such as the underground cable are designed to National Grid technical standards to be resilient to flooding, wind, storms, extreme temperature and earth movement. The **Outline CoCP [APP-300]** describes the good practice measures including SuDS for managing surface water flood risk that would be adopted. As per good practice measure W08, surface water runoff from operational above ground infrastructure would be managed in accordance with the requirements and standards of the relevant LLFA using suitable SuDS that are maintained for the Project's lifetime. |
| | Policy C&W 17 - Public Rights of Way | Measures to improve and extend the existing network of public rights of way will be supported<br>particularly if their value as biodiversity corridors is recognised and protected and efforts are made to enhance biodiversity as part of the proposal. | The **Outline PRoW Management Plan [APP-328]** provides a list of each of the affected PRoWs and the proposed management proposals. The Project is not expected to result in any permanent closures or diversions of footways or the cycle network as a result of the construction activities of the Project.<br>A limited number of temporary diversions including a managed closure on S-FP-118.1 will be required as part of the undergrounding of the existing PCB Overhead Line. |

# Abbreviations

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

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

# Glossary

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

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

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

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

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

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

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

| Term | Description |
|---|---|
| | cables. Because of the uneven load on one side of the pylons, much deeper and heavier foundations are required on the unloaded side. |
| Transmission line | A National Grid overhead line and underground cable which transmits electricity between National Grid's substations. Power is transmitted at high voltages (275 kV or above) between power stations where it is generated and the local electricity supply networks of the regional Distribution Network Operators where it is transformed to lower voltages (132 kV or below) for supply via distribution lines to local communities. |
| Transport Assessment | Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport effects of the Project. It is separate to Chapter 16: Traffic and Transport **[APP-271]**. |
| Trenchless crossing | A crossing installation method that has limited above-ground disturbance which is used to avoid a sensitive feature such as an environmental feature. |
| Triple Araucaria conductors | Triple Araucaria conductor design is the least electrically stressed conductor system that National Grid uses. It is the best design for reducing the effects of line crackle (corona discharge). |
| Topsoil | Material which developed originally at the top of the soil profile and is characteristically darker in colour and has a higher organic matter content than subsoil material. |
| Temporary construction compounds | Temporary compounds installed during the construction phase of the Project. Each compound may contain storage areas including laydown areas, soils storage and areas for equipment and fuel, drainage, generators, car parking and offices and welfare areas (portacabins). |
| UK Power Networks | UK Power Networks (Operations) Limited (registered company number 03870728) and/or its affiliate Eastern Power Networks plc (registered company number 02366906) as applicable. |
| Underground cable | An insulated conductor carrying electric current designed for underground installation. Underground cables link together two Cable Sealing End compounds. |
| Value engineering | Value engineering in transmission projects involves a systematic approach to optimising the project's value by finding the most cost-effective way to achieve its essential functions without compromising quality or performance. It is a team effort that examines all aspects of the project, from planning to construction, to identify areas where costs can be reduced or improved without sacrificing the project's objectives. |
| Visibility splay | Areas of tree/vegetation removal, typically where access points are, to enable a driver to see down the road and know when the road is clear. |
| Voltage | The electrical potential difference between two points. |

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

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