

AENC-NG-CNS-REP-0289

Norwich to Tilbury

Volume 8: Examination Submissions

Document 8.5.4 Applicant's Response to the Open Floor Hearings

Final Issue A

February 2026

Planning Inspectorate Reference: EN020027

nationalgrid

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1. About this Document

1.1 Introduction

- 1.1.1 This document provides the Applicant’s written response to the oral submissions made by Interested Parties at the Open Floor Hearings (OFHs) during week commencing 9 February 2026 in relation to the Norwich to Tilbury Project (‘the Project’).
- 1.1.2 This included three OFHs split across four sessions and three days, as follows:
- OFH1 Session 1: Tuesday 10 February 2026 at Ipswich Football Ground: Start 4:00pm, closed 5:56pm
 - OFH1 Session 2: Wednesday 11 February 2026 at Ipswich Football Ground: Start 10:00am, closed 12:19pm
 - OFH2 Session 1: Thursday 12 February 2026 at Orsett Hall, Essex: Start 10:00am, closed 12:06pm
 - OFH3 Session 1: Thursday 12 February 2026 at the Space, Norwich: Start 11:00am, closed 12:23pm.

1.2 Scope of this Document

- 1.2.1 The three OFHs were held during week commencing 9 February 2026. In the OFH agendas [**EV2-001, EV2-003 and EV2-004**] the Examining Authority noted that although the Applicant would not be asked to address questions raised by Interested Parties at the OFHs, it should respond as written submissions at the next relevant deadline. This document provides that written response. The Applicant confirms that it attended each of the OFHs and listened to the representations made by the Interested Parties. The Applicant took note of the points raised and in providing this response has cross-referenced these notes against the recordings and transcripts of the hearing sessions subsequently published on the Planning Inspectorate website [**EV4-001 to EV4-008, EV6-001 to EV6-004 and EV7-001 to EV7-002**] to ensure accuracy and full understanding of the points raised.
- 1.2.2 The Applicant has responded to the main themes within this document but will be reviewing the written submissions provided by third parties at Deadline 1 and will consider specific points raised in its response at Deadline 2.

1.3 Approach and Methodology

- 1.3.1 In responding to the submissions made at the OFHs, the Applicant has adopted a topic-based thematic approach. The key themes have been distilled from the notes, transcripts and recordings. This response document aims to provide a proportionate response, focussing on the substance of the issues raised. By grouping related points together, this approach aims to deliver a comprehensive response to the matters discussed, avoiding unnecessary repetition and ensuring clarity for all interested parties.

1.4 Structure of this Report

- 1.4.1 Chapter 2 of this report presents written responses to the topics that have been addressed under the broader themes. These are presented in themes and also contain links to other relevant documents providing supporting information. There is also an annex at the end of this report which shows which themes were raised by each Interested Party at each OFH.

2. Applicant’s Response to Oral Submissions

2.1 Applicant’s Response to Oral Submissions

2.1.1 Table 2.1 sets out the Applicant’s response to the themes raised during the OFH. Table A1 in Annex A provides a cross reference to each Interested Party and the themes they raised during the OFH.

Table 2.1 Applicant’s response by theme

Topic/Theme raised by Speakers	Applicant’s Response
Policy and Legislation	
General green policy	The UK Government is committed to achieving clean electricity by 2030 as set out in the Clean Power 2030 Action Plan ¹ . Clean Power 2030 is considered key to accelerating progress towards and achieving net zero by 2050. This represents the latest Government policy and position on clean energy. Under its transmission licence, National Grid has a statutory duty to respond to generation customers wanting to connect to the transmission network, whether this be for wind, solar, nuclear, tidal or from other forms of generation.
Application of the National Policy Statement (NPS), Holford Rules and National Planning Policy Framework	Nationally Significant Infrastructure Projects (NSIPs) of this nature are guided by national planning policy (for this Project NPS EN-1 and EN-5, 2024 versions). However, national planning policy in the form of the National Planning Policy Framework ² (NPPF) and local planning policy was also considered in developing the design of the Project where possible. 5.6 Planning Statement [APP-085] presents an appraisal of the Project’s compliance with national policy including EN-1, EN-5, EN-3, the NPPF and relevant local plan policies. The Planning Statement should be read in conjunction with 5.7 Policy Compliance Document [APP-086] which sets out an analysis of the compliance of the Project with the specific relevant policies.

¹ Department for Energy Security and Net Zero (2024) *Clean Power 2030 Action Plan: A new era of clean electricity*

² Ministry of Housing, Communities and Local Government (2024) *National Planning Policy Framework*

Topic/Theme raised by Speakers	Applicant's Response
	<p>Paragraph 5 of the NPPF makes it clear that the Framework does not contain specific policies for developments requiring development consent and that applications for development consent are to be determined in accordance with the decision-making framework set out in the Planning Act 2008:</p> <p><i>'The Framework does not contain specific policies for NSIPs. 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).'</i></p> <p>While the NPSs remain the primary decision-making documents, regard has been had to any other matters of importance and relevance, which include relevant policies in the NPPF.</p> <p>The Applicant disagrees that the Holford Rules³ have not been considered. 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, and the Design Development Reports published as part of the 2023 non-statutory consultation (7.20 2023 Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]), all set out how the Holford Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rule 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering the Holford Rules.</p>
Section 106 agreements	<p>Any planning obligations must be in accordance with the legal tests in Regulation 122 of the Community Infrastructure Levy Regulations 2010:</p> <p><i>'(a) necessary to make the development acceptable in planning terms;</i> <i>(b) directly related to the development; and</i> <i>(c) fairly and reasonably related in scale and kind to the development.'</i></p> <p>The case has not yet been advanced that those tests have been met.</p>

³ National Grid Company (1959) *The Holford Rules*

Topic/Theme raised by Speakers	Applicant's Response
Alternative Options	
Strategic planning of energy infrastructure	<p>In April 2024, National Grid Electricity Transmission provided a response to the electricity system operators (ESO) East Anglian network study, which was part of the Offshore Network Review (OTNR)'s initiative to explore coordinated offshore infrastructure. This response indicates National Grid Electricity Transmission's engagement with the OTNR's findings and its consideration of these insights in planning and developing transmission projects. By integrating the OTNR's 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.</p> <p>One consequence of these studies is a continued co-ordination between North Falls and Five Estuaries over the onshore cable installation that has reduced the working width requirement of their onshore connections. This was identified by National Grid to potentially have implications for decision making regarding East Anglia Connection Node (EACN) substation siting and has been reviewed with the findings set out in Chapter 4 of 5.15 Design Development Report [APP-122]. North Falls and Five Estuaries submitted their applications for development consent in advance of National Grid's Norwich to Tilbury Project. Due to these differing timelines, the projects are proceeding separately. The Project has assessed the cumulative impacts arising from the three individual projects and this assessment is report in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281].</p>
Offshore	<p>The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122] paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the Government's strong starting presumption in NPS EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.</p>
High voltage direct current (HVDC)	<p>National Grid considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of AC overhead line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives.</p> <p>In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.</p>

Topic/Theme raised by Speakers	Applicant's Response
	<p>As set out in Chapter 15 [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base).</p> <p>Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault.</p> <p>Losing more than 1800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.</p>
Ultra HVDC	<p>Ultra HVDC refers to power transmission systems operating at above 800 kV. It is designed for extremely long distances and large power capacities. It is currently still in a very early stage of development, with no current examples of where this is being used across the globe. This technology is in an embryonic form and would not be available in the timeframes of the Norwich to Tilbury Project.</p>
Hiorns Report	<p>At each key stage of the consultation and submission process, the need case is reviewed and updated. Both the contracted background, as contained in the National Energy System Operator (NESO) Transmission Entry Connection Register and the NESO Electricity Ten Year Statement⁴, is reviewed. The most recent update was completed to capture the latest information as of June 2025, as set out in 7.17 Strategic Options Backcheck and Review [APP-355].</p> <p>The timing and urgency for electricity infrastructure is referred to within Overarching National Policy Statement for Energy (EN-1) (2024):</p> <p><i>'3.3.68 The volume of onshore reinforcement works needed to meet decarbonisation targets is substantial. National Grid ESO forecasts that over the next decade the onshore and offshore transmission network, some of which is located offshore will require a doubling of north-south power transfer capacity due to increased wind generation in Scotland; [...] 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).'</i></p>

⁴ National Energy System Operator (2024) *Electricity Ten Year Statement*

Topic/Theme raised by Speakers

Applicant's Response

'3.3.83 Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.'

National Policy Statement for Electricity Networks infrastructure (EN-5) (2024) also states the following regarding Transmission Owners:

'2.8.4 The Secretary of State should also take into account that Transmission Owners (TOs) and Distribution Network Operators (DNOs) are required under Section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design.

2.8.5 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.'

7.19 2023 - Strategic Options Backcheck and Review [APP-357] Appendix A page A3 sets out the Applicant's Transmission Owner Licence obligations providing detail to the duties referred to within EN-5:

- *'Condition D2: Obligation to provide transmission services', which includes 'responding to requests for the construction of additional transmission system capacity'.*
- *'Condition D3 Transmission system security standard and quality of service' which includes 'Transmission owners are required to at all times plan, develop the transmission system in accordance with the National Electricity Transmission System Security and Quality of Supply Standard ('NETS SQSS')'.*

Both Conditions D2 and D3 oblige National Grid to ensure sufficient capacity for connections and system reinforcements to reach compliance with the NETS SQSS.

The factors above show the 2025 updated need case continues to indicate the urgent need for reinforcement for both Contracted, and Electricity Ten Year Statement⁵ requirements aligned with NPSs and Transmission Licence Obligations.

The Applicant carefully considered the independent review carried out by Hiorns Smart Energy Networks in September 2023. Our response to the findings of the Hiorns Report⁶ was published in April 2024 and is available on the Project website. In summary we do not accept the Report's conclusions around the timing of need for additional capacity being closer to 2035 than 2030. National Grid Electricity

⁵ National Energy System Operator (2024) *Electricity Ten Year Statement*

⁶ Suffolk County Council (2023) *The Hiorns Report*

Topic/Theme raised by Speakers	Applicant's Response
	Transmission is legally obliged (under our Transmission Owner Licence) to provide capacity at the dates formally agreed in contracts with energy generators (or customers). Contract dates are set out in the National Energy System Operator's Transmission Entry Capacity register ⁷ .
Reinforcement of existing lines	The Applicant has made it clear throughout the development of the Project through consultation material and webinar briefings, that it was already implementing actions to uprate the conductors on the existing Norwich to Bramford connection and installing control equipment to maximise the capability of the existing network. The electricity transmission system in East Anglia now operates at the maximum allowed level for 400 kV infrastructure which is that identified by the International Electrotechnical Commission rating of 5,000 A continuous. Even with these actions there is a requirement to add additional capability to meet the requirement of signed customer agreements.
Underground cables	<p>NPS EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way⁸. 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.</p> <p>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, even 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.</p> <p>In accordance with EN-1 (2024) and EN-5 (2014) 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.</p>
Alternative route/ undergrounding in the Waveney Valley	The Applicant has set out its consideration of alternatives in the vicinity of Diss, for the crossing of the Waveney Valley in 5.15 Design Development Report [APP-122] from paragraph 4.6.21. Overall, in

⁷ National Energy System Operator (n.d.) *Transmission Entry Capacity register*

⁸ Electricity Act 1989, Section 9

Topic/Theme raised by Speakers

Applicant's Response

terms of routing at Diss for the crossing of the Waveney Valley, it has been concluded that the alignment (comprising an overhead line) is preferred.

With regards to undergrounding, the Applicant has set out above its overall position regarding the use of overhead lines in accordance with national policy, and has considered the justification for the use of underground cable for the crossing of the Waveney Valley. The starting presumption in NPS EN-5 (2024) paragraph 2.9.20 in a location such as the Waveney Valley which, although valued is not designated, is that overhead line is the appropriate 400 kV connection technology. The Applicant has also considered whether the effects from the overhead line are at a level that engages other parts of NPS EN-5 (such as paragraph 2.9.23) to prompt consideration of whether the benefits of undergrounding outweigh any extra economic, social or environmental impacts. At the Waveney Valley, the Applicant concludes that the benefits from a change to underground cable, do not justify the additional cost that would be incurred.

The use of underground cable would lead to a lowering of effects on the setting of the Grade I Listed St Remegius Church, albeit the effects of progressing with an overhead line are assessed as less than substantial harm and do not themselves require a change in technology (see EN-1 section 4.17). In terms of community effects, existing trees would provide some screening and filtering of views of an overhead line for those in residential areas and on recreational routes. A change from overhead line to underground cable would reduce these community effects but bring disbenefits, most notably increased ecological effects from installation within peaty soils and increased technical risk to cable integrity from the Waveney and Little Ouse Recovery (WaLOR) channel naturalisation and landscape recovery plans. Conversely there may be compromise to the WaLOR project by measures to ensure cable integrity.

After consideration of the decision-making guidance at paragraph 2.9.25 of NPS EN-5, the Applicant concludes that whilst effects from overhead lines to individual receptors may be significant in EIA terms, they do not justify the potential for compromise to the WaLOR project, the effects on peaty soils which would arise with an underground cable design nor justify the expected cost of an underground cable design. On this basis, the Applicant concludes that the use of an overhead line should be taken forward for the crossing of the Waveney Valley. Prior to making this decision the Applicant had considered whether requests to relocate the Cable Sealing End (CSE) compounds and extend the cable both to the north and the south may alter the decision making balance. Such extensions would bring benefits to various residential receptors but with the additional cost of longer length of cables. We conclude that given the absence of any designated status pertinent to NPS EN-5, and the extent to which some views from residential areas are filtered and screened and which lowers the level of adverse effects from the overhead line, we do not consider the additional cost associated with extending the underground cable would be justified.

Topic/Theme raised by Speakers	Applicant's Response
<p>Alternatives at the Colne Valley (Fordstreet, Aldham and Fordham)</p>	<p>Paragraph 5.4.136 of 7.21 2024 - Design Development Report [APP-359] notes that an alternative alignment to the west of Fordstreet and Fordham was considered and sets out the reasoning why a western option was not preferred when compared to the alignment. The report summarises that <i>‘Overall whilst noting some potential for a reduction in the number of residential properties with potential amenity effects if the western alternative was taken forward, this would be a longer less economic and efficient route with more pylons and angle pylons. It would also potentially increase effects in respect of construction within a flood zone (but subject to micrositing this difference may be avoided) and be likely to increase effects on heritage assets including a Grade I listed building and several moats associated with listed buildings. It is also noted that the 2023 preferred draft alignment is consistent with policy and overall, it is considered that there would be insufficient benefits from potentially reduced residential amenity and landscape effects of the western alternative to offset the technical concerns and additional infrastructure required for delivery it. On that basis the 2023 preferred draft alignment, subject to localised modifications, remains preferred and has been taken forward as the 2024 preferred draft alignment.’</i></p> <p>Any larger shifts in the preferred alignment (east or west) would bring the alignment closer to areas of settlement either in Fordstreet and Fordham in the west, closer to areas of community woodland and to the Fordstreet Conservation Area in the west, or to the ancient woodland at Fiddlers Wood and the area of settlement at Gallows Green in the east. Due to the direction required to make the grid connection (the Project), a crossing of the river and of the Essex Way and associated network of public footpaths is required. Routeing has sought to minimise effects on these where possible, including at the construction phase, by avoiding the areas of highest environmental value, such as ancient woodland. As such, this alignment remained preferred and was assessed as part of the EIA for the Project.</p> <p>EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way. 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.</p> <p>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, even 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.</p> <p>In accordance with EN-1 (2024) and EN-5 (2024) policy, the Applicant has applied the strong presumption of overhead lines in the correct places, including the Colne Valley, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included</p>

Topic/Theme raised by Speakers	Applicant's Response
Alternatives that follow A12 corridor	<p>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.</p> <p>Paragraph 5.2.16 of 7.21 2024 - Design Development Report [APP-359] describes that whilst there could be potential benefits from infrastructure being concentrated geographically, i.e., by routeing the Project in close proximity to existing road and rail infrastructure, the Applicant does not consider these benefits arise for the section of the A12 indicated.</p> <p>There are constraints and features that mean that the Applicant does not consider close paralleling the A12 will reduce environmental effects or improve compliance with the Holford Rules or be more consistent with the policy requirement to be economic and efficient. Several residential properties, as well as hamlets, villages and towns, are present in close proximity to the existing transport infrastructure necessitating multiple diversions of an overhead line. There are also some locations, such as to the east of Capel St Mary, where the combination of existing physical and environmental features (road infrastructure, commercial and residential property, woodlands etc) present very substantial challenges to routeing and siting. As a result, whilst close paralleling of transport infrastructure may appear beneficial in some short sections, overall, the increased environmental effects from multiple changes of direction are considered greater and less compliant with the Holford Rules than those that are associated with a new route alignment. We have undertaken an EIA to assess the potential impact of the Project, and this has identified any need for additional mitigation.</p>
Alternatives at Great and Little Waltham including low heights	<p>The Applicant has considered alternative alignments to the east and west of Chelmsford, modifications to the alignment consulted upon along with the selection of pylon type, as well as the justification for the use of underground cable. In 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published as part of the 2022 non-statutory consultation, and in 7.20 2023 - Design Development Report for the Project [APP-358] and 7.21 2024 - Design Development Report for the Project [APP-359], the Applicant set out the challenges associated with routeing either further to the west or to the east of Chelmsford, parallel to the existing 400 kV overhead line. Whilst noting the respondent's preference for one of these alternatives, no new factors have been identified, nor new evidence provided or identified, to remove the basis for previous decision making.</p> <p>Firstly, it is noted that the assessments of the Project alignment conclude that it is not unacceptable in policy terms and there is no specific need therefore to change; nonetheless we have reviewed other route alternatives. The eastern route around Chelmsford remains less preferred and no change to the fundamental constraints to successful routeing to the east has been identified or proposed. The Applicant</p>

Topic/Theme raised by Speakers**Applicant's Response**

has also previously reviewed a more westerly alignment which would be routed away from Little Waltham and to the west of Great Waltham diverting from the south of Great Leighs towards Pleshey and then southwards past Great Waltham towards Chignal Smealy. Whilst noting a reduction in some effects for this more western alternative, it would be a longer route by 2.5 km to 3 km with a degree of transfer of effects. Given that none of the effects arising for the Project alignment are considered to be at a level which is unacceptable in policy terms, the Applicant continues to prefer the Project alignment and for the reasons stated, the eastern and western alternatives are not progressed.

In response to feedback received during the 2024 statutory consultation and 2025 targeted consultation, the Applicant has considered the application of the mitigation hierarchy including alternative pylon types and the case for the use of underground cable. In respect of the use of underground cable, the location is not designated in terms that engage a switch from the starting presumption of the acceptability of overhead line, in NPS EN-5. Nor do we consider that the effects meet the thresholds associated with paragraph 2.9.23 of NPS EN-5 to prompt the use of underground cable in certain other areas. Even if the thresholds were met, a likely design requirement would be CSE compounds somewhere north of TB136 and south of TB143 which would bring their own effects and an additional cost that we do not consider to be justified given the levels of effect arising from the Project alignment.

The Applicant has also considered pylon type and localised alignment variations responding to feedback from Historic England and other stakeholders. The Applicant is of the view that T-pylons are not an appropriate design selection, as in this location they will be viewed in most cases against vegetation and appear more stark than the alternative lower height lattice pylon. The Applicant does however consider that a low-height lattice pylon will be beneficial for a section of the route north of the River Chelmer. This is a revision aimed specifically to reduce impacts on nearby designated heritage assets, including Little Waltham and Great Waltham Conservation Areas and a designed garden avenue view from the Grade I Langleys listed building. As part of this refinement, the alignment has been adjusted in combination with some use of lower-profile pylons to reduce visibility and reduce the impact of the infrastructure on the historic landscape and its setting. To the south of the River Chelmer we have considered feedback on arrangements including standard lattice pylons (requires two pylons) as well as arrangements with low-height lattice pylons (which requires three pylons). The latter positions a pylon close to Chelmsford Road in relatively direct view from a home and for these reasons is less preferred. The Project, subject to confirming certain technical details, will progress using the defined Limits of Deviation with the use of two standard pylons between TB143 and the river with four low-height pylons to the north of the river in place of three low-height pylons shown on the works plans.

Topic/Theme raised by Speakers	Applicant's Response
Use of T Pylons	<p>The latest independent report on the Comparison of Electricity Transmission Technologies: Costs and Characteristics⁹ confirms that whilst T-Pylons may in certain locations provide an alternative to conventional overhead lines with potential benefits in visual impact and reduced land-take, this comes at a higher cost. The build cost is approximately 2 to 2.5 times that of an equivalently rated conventional overhead line, and the lifetime costs are around 1.6 to 1.7 times higher. The current arrangements for the oversight of funding by Ofgem require that the lowest cost acceptable design is taken forward rather than a more expensive design even where the latter is perceived to reduce the level of effect. As such, consideration of the use of T-pylons follows after establishing a need to mitigate effects of the standard lattice design and after considering the benefits of adopting a low- height lattice pylon design. T-pylons themselves are also less adaptable to varied terrains and require more substantial access infrastructure. Furthermore, while their resilience and environmental impact are comparable to conventional overhead lines, they have increased carbon intensity due to construction materials used.</p> <p>Attention also needs to be given to the transitions between pylon types. Given it is the surrounding context that drives the need for alternative design mitigation, where this is not required along the entire route, any visual break and transition in pylon design also needs to be carefully sited. Assessment findings have concluded that, where there is not a reversal of the presumption to use overhead lines, the use of lattice pylons (either standard or low height) is consistent with planning policy throughout the route. Whilst there may be some locations (for examples see Appendix A of 5.15 Design Development Report [APP-122]) where there may be a design option for the use of T-pylons, the need to mitigate unacceptable effects from lattice pylons is not engaged. On this basis, T-pylons are not proposed for the Project.</p>
Location of EACN Substation	<p>From paragraph 6.5.8 of 5.15 Design Development Report [APP-122], the Applicant has set out its consideration of alternative locations for the EACN Substation. This sets out the reasons for continuing to prefer the EACN Substation location to the east of Ardleigh. This is due to the greater effects arising from the different combinations of substation siting and connection corridor presented by the alternatives. In particular, the increased number of cable corridors to make the customer connections, compared with the one corridor for the 400 kV requirement, is a relevant factor that has been taken into account. An additional contributory factor, noted in paragraph 6.5.21 of 5.15 Design Development Report [APP-122], is risks to programme (which is related to contractual and licence obligations), which is a legitimate</p>

⁹ Institution of Engineering and Technology (2025) *Comparison of Electricity Transmission Technologies: Costs and Characteristics*

Topic/Theme raised by Speakers	Applicant's Response
Security and resilience of electrical infrastructure	<p data-bbox="555 225 2042 293">consideration in the context of a Critical National Infrastructure Project where both the capacity and timing of delivery are key aspects of the Project need case.</p> <p data-bbox="555 320 2042 576">The Applicant's 400 kV overhead lines are designed to remain robust and operational in the worst weather conditions in the UK. Although overhead lines are more susceptible to disruption from lightning and high winds, the overhead line structures do include an earthwire at the top of the pylons which is designed to shield the electrical conductors from lightning strikes. In the event that a conductor is struck by lightning the electrical system has in built protection that allows millisecond speed returns to service in the event of a strike; they are also comparatively easy and cost-effective to repair and maintain compared to underground cables.</p> <p data-bbox="555 592 2042 842">The majority of the Applicant's existing transmission network is constructed from overhead lines; these are a demonstrated and reliable form of electricity transmission in the UK. They are designed to meet current design and safety standards and to operate in a range of typical and abnormal weather conditions found in the UK. Standards are regularly reviewed and any adjustments to these standards (for example with regard to climate change) would need to be applied to the entire network. At this stage no known changes are required for a new overhead line Project. Unforeseen events of sufficient severity to cause damage to infrastructure are very rare in the UK but do occur.</p> <p data-bbox="555 858 2042 1182">Overhead lines could be subject to adverse weather conditions such as high wind speeds and lightning strikes. In the unlikely event an overhead line was to be damaged, a network wide monitoring system would detect the fault almost immediately and the circuit would be tripped, and the live current stopped. At the point of repairing any damage, overhead lines are comparatively easier and more cost-effective to repair and maintain than alternative transmission technology. We also undertake regular ground-based inspections of the overhead line using thermal imaging to assess damage to the overhead line and utilise helicopters and drone equipment with high definition and thermal imaging cameras to assess damage to the overhead line from weather or other causes. This means low level damage caused would be identified and repaired prior to failure of the line.</p> <p data-bbox="555 1198 2042 1449">Each pylon on the National Grid Transmission System is risk assessed in relation to vulnerability of unauthorised access. To reduce unauthorised access from the ground as far as practicable, we install anti-climb measures such as barbed wire to the bases of pylons in order to prevent access by members of the public. Clear signage is installed warning of the dangers of high voltages and regular inspections are undertaken depending of the level of vulnerability. However, the possibility of interference remains as pylons are typically situated in isolated locations where constant surveillance is impractical. At the point of repairing any damage, overhead lines are comparatively easier and more cost-effective to repair and</p>

Topic/Theme raised by Speakers	Applicant's Response
	maintain than alternative transmission technology. We also undertake regular inspections of the overhead line using thermal imaging to assess damage to the overhead line from weather or other causes. This means low level damage caused would be identified and repaired prior to failure of the line.
Cost	
Monetisation of environmental impacts / use of the green book	The Applicant is confident that the process we follow to identify and then assess potential strategic options is robust and the most appropriate. This has been tried and tested through numerous previous projects, the formal Examination process and ultimately decided by the relevant Secretary of State. The Treasury Green Book (updated in 2026) ¹⁰ provides guidance on the interpretation by public servants of public spending, assets and resources for projects, policies and spend from the public purse. That is not relevant for National Grid Electricity Transmission. There is no requirement in the Planning Act 2008 for developers to have to submit a Treasury Green Book assessment as part of a Development Consent Order (DCO) application. National Grid Electricity Transmission is an Ofgem regulated business, with obligations to consider customer, environmental and other considerations as outlined in the Electricity Act 1989 and in its licence commitments. Consideration of the costs of a project and the funding it should receive via the regulatory settlement is the subject of a separate regulatory process, and it is not appropriate for the Planning Inspectorate, Examining Authority or the Secretary of State in their remit under the Planning Act 2008 to seek to duplicate other regimes.
Whole life cost comparison	The 7.19 2023 - Strategic Options Backcheck and Review [APP-357] includes a detailed methodology set out in Appendix D Economic Appraisal and Appendix E Mathematical Principles used for AC loss Calculation. A table for Project capital costs and Circuit Whole life Cost are set out for each option. Section 15.4 Cost Considerations contains Table 15.4 which summarises the capital cost of each option and the circuit lifetime cost of that option over a 40-year NPV calculation. The Applicant has also submitted an updated Funding Statement at Deadline 1 (4.2 Funding Statement [Revision B]).
Devaluation of properties	The Applicant recognises that visual impact from overhead lines and pylons can cause concern for communities and may lead to perceptions of property value loss. However, property values are influenced by many factors, making it hard to attribute depreciation to a single cause like infrastructure development. UK law does not include for compensation in cases of a loss of view or changes to a view. Under the

¹⁰ HM Treasury (2026) *The Green Book*

Topic/Theme raised by Speakers	Applicant's Response
	<p>Compulsory Purchase Code, property owners and businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria.</p>
Consultation	
Equator principles	<p>The Equator Principles are a voluntary risk management framework adopted by financial institutions to identify, assess and manage environmental and social risks when financing projects. They apply to specific financial products, including project finance, project related corporate loans and certain bridge and refinancing arrangements, and are implemented by Equator Principles Financial Institutions as part of their lending and investment decision making processes.</p> <p>Norwich to Tilbury is an NSIP promoted by National Grid Electricity Transmission under the Planning Act 2008 and is being assessed through the statutory DCO process. That process is governed by NPSs, including EN-1 (2024) and EN-5 (2024), and by the duties placed on the Applicant under the Electricity Act 1989. These instruments set out a legally binding framework for decision making on need, alternatives, environmental effects, mitigation, consultation and public examination, and provide the basis on which the Secretary of State will determine the application.</p> <p>The Equator Principles are therefore not a decision making framework for project design or route selection, nor are they a substitute for, or addition to, the statutory planning and consenting regime that applies to projects such as Norwich to Tilbury. Their purpose is to guide lenders in assessing environmental and social risk at the point of financing, rather than to govern how a promoter develops or consults on a project within a nationally prescribed planning system.</p>
Gunning Principles	<p>This Project comprises a proposed overhead line connection over 2 km in length, above 132 kV and is therefore classified as an NSIP. The Project would therefore require consent under the Planning Act 2008. The Government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP for developers to follow. The authors of that guidance had specific regard to the Gunning Principles as they apply to the context of NSIPs. The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation.</p> <p>A detailed response with regard to our application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N: Legal Opinions [APP-080].</p>

Topic/Theme raised by Speakers	Applicant's Response
Consultation on alternatives	<p>The Applicant has considered a wide range of alternative means for meeting the Project need and set these out in 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356] and the 7.19 2023 - Strategic Options Backcheck and Review [APP-357], published in support of the 2023 non-statutory consultation and statutory consultation and the 2025 7.17 Strategic Options Backcheck and Review [APP-355]. The Applicant has considered feedback relating to suggested alternatives and has set out its response within the 2022 and 2023 non-statutory consultation, Statutory and Targeted Consultation Feedback Reports. It would be wholly disingenuous and misleading for the Applicant to present an alternative for consultation, that would not meet the requirements placed on it by the government and its regulator Ofgem.</p>
Engagement with landowners and communities	<p>The Applicant held two non-statutory consultations in 2022 and 2023 and a statutory consultation in 2024 where we presented our proposals for the Project. At each stage of consultation, the Applicant reviewed all the feedback received and amended our proposals, where feasible, in response. Where necessary following statutory consultation, the Applicant held targeted consultations with directly affected people, where the alignment or access proposals have changed. The Applicant believes that this is adequate for a project of this size to allow the public time to have careful consideration and engagement with the proposals and leave meaningful feedback.</p> <p>In early 2026, the Applicant consulted on two small changes to the proposals. Details of the approach taken, feedback received, and how the Applicant has given regard to the feedback will be reported in the Consultation Reports submitted as part of the Proposed Change Applications.</p> <p>The Applicant is and will continue working with key statutory bodies and other stakeholders, including all landowners who may be affected by the proposals, to understand the impacts on their operations and to work with them as the Project is developed.</p> <p>If the Applicant receives development consent, it will continue to work with relevant stakeholders, local communities and affected landowners to ensure information is communicated and to respond to concerns and complaints.</p> <p>The Applicant listens to all the feedback received. Many of the changes presented at the statutory consultation were as a direct result of the information and feedback the Applicant received at the 2022 and 2023 non-statutory consultations. The Applicant has continued to listen to all feedback received during the consultation. Feedback was sought on the 2024 preferred draft alignment, including pylon positions, the locations of underground cables, CSE compounds, the EACN Substation and the changes that were made to the route since the last consultation, alongside issues of access and permanent and</p>

Topic/Theme raised by Speakers

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temporary haul roads. The Applicant also wanted to know about any concerns or questions about the proposals, or if there were any local factors that should be considered.

The feedback received both through the statutory consultations and ongoing landowner engagement has informed how the proposals have been developed. Where this led to a significant change from what was presented at statutory consultation, the Applicant held targeted consultations with directly affected properties and communities, throughout February and March 2025. How the feedback was considered, and any changes made as a result of this, have been set out in **5.1 Consultation Report [APP-066]** and in **5.15 Design Development Report [APP-122]**.

Parallel with the various stages of statutory consultations referred to above, Landowner engagement has been a continuous, structured and iterative process throughout the development of the Project and has been proportionate to its scale and complexity. The Project affects approximately 5,200 Persons with an Interest in Land (PILs) and around 925 landowners requiring engagement and negotiations across an approximately 184 km route. In response, the Applicant has implemented a comprehensive engagement strategy to ensure that all affected parties have been identified, informed and given opportunities to engage in dialogue. Throughout these stages, PILs and landowners have been contacted directly by letter, provided with land plans and explanatory material, invited to public events and webinars, and offered one-to one meetings with the Applicant and its land agents. Engagement has extended beyond formal consultation exercises and has included site meetings, targeted discussions on specific impacts, and ongoing correspondence to address individual landowner concerns.

The Applicant has actively taken account of landowner feedback. Following each round of consultation, the Project undertook a formal change control process through which changes to the proposals were considered and, where appropriate, accepted. Many of these changes arose directly from landowner representations and related to matters such as:

- alignment and pylon siting adjustments;
- refinement of the Order Limits and land-take;
- construction access, haul roads and compound locations; and
- mitigation and accommodation works to reduce effects on retained land and agricultural operations.

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It is also important to note that not all requests received can be accommodated. Every request is carefully considered by the Project team, and a decision not to make a change should not be taken as a lack of engagement or consideration. In some cases, changes are not made where they would increase impacts on other parties, conflict with established routing or design principles (including the Holford Rules), introduce new and unacceptable environmental or technical constraints, or create inconsistency with relevant policy or consenting requirements.

Where changes were accepted that had the potential to materially affect individual land interests, the Applicant carried out targeted engagement with those landowners to explain the proposed amendments and seek further input. This demonstrates that engagement has been responsive and adaptive, rather than fixed or tokenistic.

Furthermore and in parallel, the Applicant has progressed voluntary negotiations with landowners wherever possible. Populated Heads of Terms have been issued, meetings with landowners and their professional advisers are ongoing, and templates have been amended to reflect feedback received on practical matters such as soil management, drainage, access and accommodation works. Engagement is therefore continuing at an individual level, focused on securing agreements and resolving plot specific concerns.

The Applicant recognises that, given the number of land interests affected and the complexity of the Project, negotiations remain ongoing. This does not indicate a lack of engagement but reflects the scale of the Project and the need to consider landowner specific circumstances carefully.

The Applicant recognises that not all landowners affected by the Project have appointed a professional agent. Where no agent is appointed, the Project's Lands team engages directly and proactively, providing clear and accessible information and opportunities for dialogue. This includes:

- direct written correspondence explaining the Project, the land or rights sought, and the relevant statutory process;
- provision of clear plans and explanatory material tailored to the individual land interest;
- offers of one-to one meetings or calls with members of the Lands team or the Applicant's land agents to discuss concerns in plain terms; and
- follow up correspondence to address questions or clarify matters raised.

The Applicant is mindful of the need to avoid placing unrepresented landowners at a disadvantage. Accordingly, engagement with such landowners focuses on:

Topic/Theme raised by Speakers	Applicant's Response
	<ul style="list-style-type: none"> • explaining the purpose and effect of Heads of Terms, option agreements and statutory powers in a nontechnical manner; • clearly distinguishing between voluntary negotiations and the separate Development Consent Order process; and • allowing appropriate time for landowners to consider information and seek independent advice if they wish. <p>Unrepresented landowners are informed that they may appoint a professional adviser at any stage of the process and that, in line with established practice, the Applicant will meet the reasonable fees of landowners' advisers. The Applicant considers it important that landowners are aware of this option but does not require or pressure landowners to appoint an agent.</p> <p>We are aware some landowners made comments in the open floor hearings about engagement. We have made contact or are in the process of contacting each of them individually to discuss any concerns and to progress further discussions.</p> <p>Further information on our land engagement strategy along with updates on the outcomes of discussion with landowners will be set out in our Land Rights Tracker submitted at various deadlines during the Examination.</p>
Construction	
Impacts on communities	<p>Volume 6: Environmental Statement has been prepared in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Environmental Statement identifies and assesses the likely significant effects on the environment resulting from the construction of the Project and recommends appropriate mitigation to reduce effects. Environmental mitigation measures including those to mitigate air pollution and noise pollution have been defined within each environmental topic chapter and set out in relevant management documents submitted with the DCO application, including 7.2 Outline Code of Construction Practice [APP-300], 7.3 Outline Construction Traffic Management Plan [APP-309], 7.4 Outline Landscape and Ecological Management Plan [AS-046] and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328].</p>
Impacts of haul road including drainage	<p>7.2 Outline Code of Construction Practice [APP-300] (the CoCP) sets out the framework for avoiding, minimising and managing damage and disruption arising from the construction and use of access roads, haul roads and temporary access routes.</p>

Topic/Theme raised by Speakers	Applicant's Response
	<p>The principles for siting and designing access routes are set out in CoCP Sections 2 and 6. These confirm that existing access routes will be used wherever practicable, with temporary access roads carefully sited and micro-sited to minimise land take and avoid sensitive receptors. The use of a largely continuous haul road is addressed by Commitment GG33, with ecological constraints covered by Commitment B02.</p> <p>Measures to protect land, soils and drainage systems are addressed in CoCP Section 6 (Agriculture and Soils) and 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]. Relevant commitments (AS01–AS03, GG06 and GG07) require pre-construction condition surveys, appropriate ground protection, maintenance of field access where practicable and reinstatement of temporary access routes following construction.</p> <p>Management of access road crossings and flood risk effects is addressed in CoCP Section 6 (Hydrology, Land Drainage and Flood Risk) and commitments W10–W15, which set out requirements for appropriate drainage, flood-resilient design and removal of temporary crossings where no longer needed.</p> <p>Potential disruption to communities, landowners and Public Rights of Way is managed through CoCP Section 6 (Socio-economics, Recreation and Tourism) and 7.6 Outline Public Rights of Way Management Plan [APP-329]. Commitments AS03, S02, S03 and GG30 provide for maintenance of access where practicable, temporary diversions where required, clear signage and ongoing community liaison.</p> <p>Construction traffic associated with access roads is controlled through 7.3 Outline Construction Traffic Management Plan [APP-309], with commitments T01–T07, AQ01 and NV07 addressing routeing, highway safety, dust, noise and ongoing maintenance of access routes.</p> <p>The mitigation measures and controls set out in the Outline CoCP [APP-300] are secured through Requirement 4 of Schedule 3 (Requirements) of 3.1 Draft Development Consent Order [APP-056].</p>
<p>Alternatives to stone haul road</p>	<p>The application applies a reasonable worst-case assumption for haul road construction requirements, and applies established industry methodology and materials, including the use of stone aggregate. Options to reduce the volumes of stone, including soil stabilisation, or to provide alternative haul road construction, such as track matting, may be identified in some instances. The process of determining this will be carried out at the detailed design stage to refine the temporary haul road designs and identify opportunities to reduce material volumes required where site-specific conditions are suitable and it is practicable to do so.</p>

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Working hours

The proposed construction core working hours (unless otherwise approved by the relevant planning authority) are:

- Monday – Friday: 07:00 to 19:00
- Saturday, Sunday and bank holidays/public holidays: 07:00 to 17:00.

Details relating to the proposed construction working hours and any associated restrictions are contained within **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. The working hours are secured through Requirement 7 of Schedule 3 of **3.1 Draft Development Consent Order [APP-056]**. The assessment within the Environmental Statement (Volume 6 of the DCO application) is based on a set of parameters that include the core working hours for the construction phase of the Project.

The construction works are largely linear and would not occur along the entire length of the Project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday. The defined core working hours provides essential flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and bank holidays. This flexibility is critical to maintaining programme resilience, allowing the Project to respond to challenges that are often outside the control of the Applicant such as adverse weather, poor ground conditions, supply chain disruption, seasonal restrictions and access constraints.

Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing consequential delay to the overall programme, and enable safe and efficient sequencing of works where extended stoppages would be impractical or disruptive. Where progress can be recovered through limited additional working rather than prolonging the programme, this can reduce overall construction duration and avoid extended impacts on communities, traffic networks, landholdings, and the environment.

7.2 Outline Code of Construction Practice [APP-300] 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 Code of Construction Practice [APP-300]** will be secured via Requirement 4(a) (Construction Management Plans) of **3.1 Draft Development Consent Order [APP-056]**.

Topic/Theme raised by Speakers	Applicant's Response
	<p>The Applicant considers that the proposed approach therefore represents a balanced and proportionate control, providing flexibility to maintain programme resilience while retaining safeguards through other DCO control to manage impacts included in Table 6.1 of 7.2 Outline Code of Construction Practice [APP-300], including controls on nuisance-generating activities (GG17), traffic impacts (GG33), dust (AQ01), lighting (GG26), monitoring and compliance (GG09, GG01), applications for prior consent under Section 61 of the Control of Pollution Act 1974 (NV03) and advance community notification (GG30).</p>
Agriculture and Soils	
Soils and best and most versatile land	<p>The impact of the Project on soil resources and agricultural land is assessed in full in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [AP-303] provides details of the approach to soil handling which would be adopted during construction by the Main Works Contractor(s) (a requirement in the DCO for compliance with the CoCP(s)) to protect and avoid damage to soil resources in line with the Defra Construction Code of Practice and other good practice guidance.</p>
Agricultural businesses including severance	<p>During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. The Applicant is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements.</p>
Impact on acid sulphate soils	<p>The Applicant has responded to this point in 8.4.6 Applicant's comments on submissions received at Procedural Deadline A [Revision A].</p>
Air Quality	
Air pollution and dust	<p>Volume 6: Environmental Statement has been prepared in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.</p> <p>The Environmental Statement identifies and assesses the likely significant effects on the environment resulting from the construction of the Project and recommends appropriate mitigation to reduce effects.</p>

Topic/Theme raised by Speakers	Applicant's Response
	<p>Environmental mitigation measures including those to mitigate air pollution have been defined within each environmental topic chapter and set out in relevant management documents submitted with the DCO application, including 7.2 Outline Code of Construction Practice [APP-300], 7.3 Outline Construction Traffic Management Plan [APP-309], 7.4 Outline Landscape and Ecological Management Plan [AS-046] and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328].</p>
<h3>Ecology and Biodiversity</h3>	
<p>Biodiversity (including tree loss)</p>	<p>Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG), for development (subject to certain exemptions); however, this requirement is not yet in force for NSIPs. Despite submitting the application for development consent before it is mandatory, the Applicant has committed to deliver 10% BNG with wider environmental and societal benefits for the Project. The 10% BNG target for the Project is currently voluntary and aligned with the Applicant's corporate sustainability commitment. In the absence of any guidelines for NSIPs, the BNG assessment methodology was presented to Natural England and Local Planning Authorities and a broad agreement on approach reached. The BNG mitigation hierarchy has been adhered to. The full details of the BNG methodology are presented in 7.1 Biodiversity Net Gain Report [APP-299].</p> <p>BNG is part of Environmental Net Gain. In line with NPS EN-1 paragraph 4.6.13 and the Applicant's commitment to deliver 10% BNG with wider environmental and societal benefits, during the offsite site selection process, the Applicant will consider BNG sites that provide wider environmental and societal benefits as stated within 7.1 Biodiversity Net Gain Report [APP-299]. The ecology baseline is presented in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. All survey scopes were agreed / discussed prior to submission with Natural England, the Environment Agency and/or Local Planning Authorities prior to the surveys being undertaken. The Environmental Statement assesses the impact on all relevant ecological receptors including bird collision risk. The assessment follows the mitigation hierarchy.</p>
<p>Birds (including bird strike)</p>	<p>The ecology baseline is presented in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. All survey scopes were agreed / discussed with Natural England, the Environment Agency and/or Local Planning Authorities prior to the surveys being undertaken. The Environmental Statement assesses the impact on all relevant ecological receptors including bird collision risk. The assessment follows the mitigation hierarchy.</p>

Topic/Theme raised by Speakers	Applicant's Response
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Collision risk has been assessed in **6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-167 to APP-170]**, **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and **5.3 Habitats Regulations Assessment Report [APP-082]**. This includes a comprehensive desk study of bird records with data obtained from the British Trust of Ornithology, Royal Society for the Protection of Birds and local records centres, resulting in >26,000 bird records, across a lengthy species list. NatureScot guidance was used to determine Target Species and Secondary Species that are susceptible to collision, and the distribution of these records has been mapped to determine hotspots and assess risk. Wintering / passage bird surveys have been undertaken to determine whether the proposed overhead lines could fragment movement corridors that are used by Target and Secondary species of birds when moving between habitat along the estuaries/coast and inland habitat, or cause mortality along such routes.

Outside these key movement corridors the Order Limits are predominantly farmland and would therefore support farmland passerines. Industry best practice guidance set out in Environmental Statements and Annexes of Environmentally Sensitive Bird Information¹¹ states passerine species are not generally considered to be significantly impacted by windfarms or overhead cables. The risk of collision to passerine species is considered low as passerines are manoeuvrable in flight and fly at low heights in general, while migratory flights are often well above pylon height.

The collision risk assessment did not identify locations which pose notable collision concern. On a precautionary basis, mitigation in the form of orange spacers and bird diverters on the earth wire are proposed at the River Waveney and Ardleigh Reservoir as detailed in **7.4 Outline Landscape and Ecological Management Plan [AS-046]**.

Geology

Sterilisation of minerals

Through routeing and siting, the Applicant has tried to avoid or limit interactions with mineral extraction sites as well as potential future extraction sites that may emerge in the upcoming minerals plan. Due to extensive areas of potential mineral extraction, complete avoidance is not always practical due to other constraints, the extent of diversion required and uncertainty in which sites may emerge. Extended Limits of Deviation have been included in several areas along the route to include optionality if such sites should emerge. A qualitative Minerals Resource and Minerals Infrastructure assessment is included within **6.9.A2 Environmental Statement Appendix 9.2 - Qualitative Minerals Resource and Infrastructure**

¹¹ NatureScot (2016) *Environmental Statements and Annexes of Environmentally Sensitive Bird Information*

Topic/Theme raised by Speakers	Applicant's Response
	<p>Assessment [APP-183], which discusses the impacts on safeguarded areas that do not have planning permission, as well as active minerals infrastructure.</p>
<p>Human Health and Wellbeing</p>	
<p>Health – general</p>	<p>The Applicant recognises people may have concerns about the health effects of living close to an overhead line. 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. The Applicant recognises that uncertainty whilst the proposals are 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 proposals through inclusive and transparent engagement with residents, communities 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. The Applicant urges anyone with concerns to get in touch through the Norwich to Tilbury Freephone number, address or email throughout the progress of the Project: Community Helpline: 0800 915 2497 (Lines are open Monday to Friday 9:00am – 5:30pm) Email: contact@n-t.nationalgrid.com Write to us: FREEPOST N TO T (No stamp or further address details are required).</p>
<p>Electromagnetic fields</p>	<p>Health considerations are given a high priority in the process by which we arrive at any proposals for new electricity circuits. Assessment of compliance with Electric and Magnetic Field (EMF) guidelines and policies is key to National Grid's approach. The UK has a carefully thought-out set of policies for managing EMFs. There have been over four decades of research looking into whether EMF can cause health effects and there are no established effects below the exposure limits. Our overhead lines, substations and underground cables' design criteria ensure they would not exceed those exposure limits, even when operating at 100% capacity. Additionally, the precautionary measures which the Government has adopted, are applied to the design to ensure EMFs reduce as quickly with distance as possible. Evidence of that compliance is presented in 7.8 Electric and Magnetic Field Compliance Report [APP-330] submitted as part of the DCO application.</p> <p>The Applicant takes this issue very seriously and looks to authoritative and independent scientific organisations such as the World Health Organization and the UK Health Security Agency to review the worldwide body of scientific evidence on health. Important decisions on health are taken independently of</p>

Topic/Theme raised by Speakers	Applicant's Response
	<p>industry, and the Applicant has followed the guidance and policies adopted by Government on advice from their scientific experts. Each of these organisations have comprehensive reviews of EMF research available to view on their websites.</p>
<h3>Historic Environment</h3>	
<p>Historic environment – general</p>	<p>The baseline and impact of the Project was assessed in accordance with the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and in accordance with professional heritage sector guidance as set out in paragraph 11.2.19. Baseline information was obtained from a variety of sources as set out in Section 11.4 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The Project has engaged with Historic England and relevant Local Planning Authorities on aspects relating to heritage, including baseline data sources, methodology for assessment and appropriate mitigation measures and to take their views into account during Project development, which are detailed in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and in the relevant Statements of Common Ground.</p>
<p>Listed buildings and conservation areas</p>	<p>Through routeing and siting, the Applicant has sought to reduce as far as practicable potential impacts on the historic environment and heritage assets. The impacts of the Project on the historic environment are assessed in 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]. The assessment considers the potential impact on historic buildings and historic landscapes and includes assessment of potential for physical impact, impact through change to setting that affects the value of a heritage asset and impact through indirect factors such as vibration or change in hydromorphology. The assessment is supported by walkover and setting surveys, as documented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. The proposals in 7.2 Outline Code of Construction Practice [APP-300] and 7.4 Outline Landscape and Ecological Management Plan [AS-046] set out appropriate mitigation for the historic environment. The Project has engaged with Historic England and relevant Local Planning Authorities on aspects relating to heritage, including methodology for assessment and appropriate mitigation measures and to take their views into account during Project development, which are detailed in 6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068] and in the relevant Statements of Common Ground.</p>
<p>Vibration impacts on listed buildings</p>	<p>An assessment of construction vibration is presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]. The assessment considers both the potential impact upon people within buildings (i.e. disturbance), and potential damage to buildings and structures. The assessment considers relatively worst-case construction methodologies and does not take account of potential mitigation. This is</p>

Topic/Theme raised by Speakers	Applicant's Response
	<p>so that potential 'hot-spots' can be identified where there is the potential for significant adverse effects, without mitigation.</p> <p>The construction vibration assessment has identified 74 locations where there is potential disturbance to people within buildings from construction vibration. Of these, 72 relate to potential vibratory compaction activities which would be expected to be for a relatively short duration (i.e. less than a day). The remaining two relate to potential piling activities for pylon foundation construction. With regard to potential damage to buildings and structures, the assessment highlights locations where there is a potential non-zero risk of damage.</p> <p>Five locations have been identified, all of which relate to potential vibratory compaction activities. In all cases, significant adverse effects, or potential structural damage, can be avoided with the use of best practicable means. This may include alternative methods, such as non-percussive/vibratory techniques. Additionally, further detailed assessments will be undertaken by the Main Works Contractor(s), as per commitment NV05 within 7.2 Outline Code of Construction Practice [APP-300] based on their specific methodologies. Based on the findings of these assessments, specific mitigation measures would be identified if required, and incorporated into the Noise and Vibration Management Plan (NVMP) which will be updated from 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306] submitted as part of the DCO application.</p> <p>The Outline NVMP includes protocols for vibration monitoring in situations where there is potential for damage to buildings or structures. Additionally, commitment NV04 of 7.2 Outline Code of Construction Practice [APP-300] includes pre- and post- condition surveys to be conducted in such situations, and a commitment to rectify any damage (cosmetic or otherwise) deemed to be caused by the works.</p>
Flood Risk	
Flood risk	<p>The Applicant has submitted a detailed flood risk assessment (FRA) (7.9 Flood Risk Assessment [APP-331]) as part of its application for development consent. This characterises existing sources of flood risk within the Order Limits, including from rivers, surface water and groundwater flooding. Areas at high risk of flooding have sought to be avoided, where practicable. The FRA assesses the impacts of the Project during construction and operation (and maintenance) and identifies control and mitigation measures to prevent increases in flood risk from these sources. For example, in the small number of locations where pylons would be situated in fluvial floodplains, a mitigation strategy has been agreed with the Environment Agency, centring on provision of compensation floodplain storage, to ensure no increase in flood risk. Other measures would be adopted to manage surface water runoff from construction work sites</p>

Topic/Theme raised by Speakers	Applicant's Response
	<p>and operational infrastructure, with a range of sustainable drainage systems (SuDS) put in place for runoff collection, attenuation and treatment. The chosen SuDS would be suitable to local prevailing ground conditions and topography, preventing effects on the water table. These controls and mitigation measures are detailed and secured through inclusion within 7.2 Outline Code of Construction Practice [APP-300].</p>
Landscape and Visual	
Landscape and visual - general	<p>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 Assessment¹².</p> <p>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]. The assessment of visual effects considers effects on the visual amenity of people and is presented in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The LVIA recognises that there will be significant landscape and visual effects of the Project during its construction and operation (and maintenance). Mitigation measures of relevance to landscape and visual effects are summarised in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].</p>
Landscape mitigation and compensation	<p>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-135] and other application documents including the 5.6 Planning Statement [APP-085].</p> <p>Whilst compensation is part of the mitigation hierarchy, NPS EN-1 (2024) and EN-5 (2024) 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 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.</p>

¹² Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, Third Edition*

Topic/Theme raised by Speakers	Applicant's Response
	<p>NPS EN-5 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 '<i>and the impossibility of full mitigation in these cases does not countermand the need for overhead lines</i>'.</p> <p>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.</p> <p>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 framework, including the further critical national priority presumption in section 4.2 of EN-1.</p> <p>The NPS position in relation to compensation (as set out above) is also consistent with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. There is no requirement under the said Regulations for all residual effects to be compensated.</p> <p>The above aligns with the Bramford to Twinstead DCO, where the Examining Authority and the Secretary of State were similarly satisfied that there is no requirement in policy to compensate all residual landscape and visual effects.</p>
National Landscape - general	<p>An assessment of effects on the special qualities of Dedham Vale National Landscape during construction and operation (and maintenance) is provided in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235].</p>
Impact on the National Landscape, including its special properties and compliance with Section 85	<p>An assessment of effects on the special qualities of Dedham Vale National Landscape during construction and operation (and maintenance) is provided in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. The assessment concludes that there would be temporary significant effects on the special qualities of the National Landscape during construction, as a result of the proposed underground cable. Once the Project is operational and the land has been restored, effects on the special qualities of the National Landscape would not be significant.</p> <p>The Applicant's consideration of its duty in relation to the Project to seek to further the purpose of the National Landscape, which is to '<i>conserve and enhance natural beauty</i>' in accordance with s85 of Countryside and Rights of Way Act 2000, is set out in 5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120].</p> <p>As reported in the 5.6 Planning Statement [APP-085], embedded mitigation has sought to minimise landscape effects as far as practicable.</p>

Topic/Theme raised by Speakers	Applicant's Response
Impacts on the green belt	<p>The impact upon landscape character and visual amenity is an inevitable consequence of the land-use change resulting from the Project. Paragraph 5.10.5 of NPS EN-1 acknowledges that <i>'virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape'</i> and paragraph 5.10.13, that <i>'all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites'</i>. For critical national priority infrastructure, <i>'the need case will outweigh the residual effects in all but the most exceptional cases'</i> (paragraph 4.1.7 of NPS EN-1).</p> <p>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.</p> <p>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.</p> <p>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 NPS EN-1 (2024) also confirms that <i>'...the Secretary of State will take as a starting point that [critical national priority] infrastructure will meet the following, non-exhaustive, list of tests:</i></p> <ul style="list-style-type: none"> • <i>Where development within a Green Belt requires very special circumstances to justify development'</i>.
Noise	<p>Noise impacts are assessed in 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256]. The assessment identifies and assesses the likely significant noise effects from the Project and recommends appropriate mitigation measures (in consultation with relevant stakeholders) to reduce potential effects. Operational noise from overhead lines is scoped out of the Environmental Statement (Volume 6 of the DCO application), in accordance with 6.20 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 6.14.A5 Environmental Statement Appendix 14.5 - Operational Noise from Overhead</p>

Topic/Theme raised by Speakers	Applicant's Response
	<p>Lines Informative [APP-261], which shows adverse effects are not expected, even directly underneath the line.</p> <p>The Project would include triple Araucaria conductors (or alternative technology that performs to the same or better standard in relation to noise on lattice pylons) for new transmission infrastructure. Due to its geometrical configuration, the triple Araucaria design is the least electrically stressed conductor system that the Applicant uses. It is the best design for reducing the effects of line crackle (corona discharge) and would reduce the generation of noise from the proposed overhead lines during operation. Pylon fittings, such as insulators, dampers, spacers, and clamps, are designed and procured in accordance with a series of National Grid Technical Specifications to reduce the potential for audible noise and wind-induced noise to occur. Operational noise from overhead lines is therefore not significant at nearby sensitive receptors under any weather conditions.</p>
Socio-economics, Recreation and Tourism	
Community benefits	<p>The Government has published guidance on community funds for transmission infrastructure¹³. In line with this guidance, the Applicant is committed to working with industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. The Applicant is committed to providing a coordinated local and regional approach to community benefits. This will be delivered outside the development consent process, since this is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the DCO, as per the Community Funds for Transmission Infrastructure: Guidance¹³.</p>
Local economy and tourism	<p>Through routeing and siting, the Applicant has sought to avoid, as far as practicable, locations that are important for leisure and tourism. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] presents an assessment of the potential impacts on sports clubs, recreational land and recreational routes located within the Order Limits. As part of this assessment, a range of measures have been considered throughout the construction phase of the Project to minimise disruption on leisure and tourism. These include: traffic management, signage and routeing measures. These are identified within 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265], 7.2 Outline Code of Construction Practice [APP-300], 7.3 Outline</p>

¹³ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure*

Topic/Theme raised by Speakers	Applicant's Response
	<p>Construction Traffic Management Plan [APP-309] and 7.6 Outline Public Rights of Way Management Plan [APP-329].</p> <p>6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] also assesses the potential for disruption to recreational routes or areas of open space which may affect opportunities for physical activity; the assessment confirms that the level of change due to the Project is low and appropriately mitigated by standard good practice construction management measures as identified in 7.2 Outline Code of Construction Practice [APP-300], 7.3 Outline Construction Traffic Management Plan [APP-309] and 7.6 Outline Public Rights of Way Management Plan [APP-329].</p>
Skills and employment	<p>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 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.</p> <p>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:</p> <ul style="list-style-type: none"> • Working with local suppliers and supporting forums, such as Chambers of Commerce • Contributing to a coordinated regional approach to electricity industry jobs and skills planning • Engaging with Local Authorities to understand local priorities and opportunities around skills and employment. <p>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.</p>
Sterilisation of housing proposal	<p>The Applicant has obtained information on existing, under construction, consented but not built schemes as well as development proposals within the planning system. The Project design has responded to those that are confirmed through consideration of routeing. In the case of development proposals, some have been amended to be designed around our proposed infrastructure but in other cases our proposals have been amended, as described in 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] and the 2025 Design Development Report (7.22 2025 - Design Development Report Addendum</p>

Topic/Theme raised by Speakers	Applicant's Response
	<p>for Proposed Changes to Connection at Tilbury [APP-360]), 2024 Design Development Report (7.21 2024 - Design Development Report for the Project [APP-359]) and 2023 Design Development Report (7.20 2023 - Design Development Report for the Project [APP-358].)</p> <p>Based on known information, and in light of changes made following consideration of feedback to the 2022 and 2023 non-statutory consultations, statutory consultation, the targeted consultations, and landowner consultation, we consider our proposals are consistent with relevant policy and guidelines and the alignment designed such that it does not prevent proposed housing developments from being successfully progressed. UK law does not prescribe minimum distances between overhead lines and homes, but any implications on landscape and visual receptors, residential amenity or from concerns about electromagnetic fields are robustly assessed as part of the EIA and balanced as part of the decision making process.</p>
<h3>Airfields</h3>	
Impact on airfields	<p>6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267] provides information on the Applicant's assessment of potential impacts of the Project on aviation, including on the safety and operation of aerodromes within a 5 km radius Aviation Impact Study Area. Furthermore, 6.15 Environmental Statement Chapter 15 – Socio-economics Recreation and Tourism [APP-265] and 6.15.A1 Environmental Statement Appendix 15.1 – Built and Other Assets within the 3 km Study Area [APP-266] provide information on assessments of Project effects on recreational aviation sites.</p>
<h3>Traffic and Transport</h3>	
Impacts on the local road network	<p>The construction vehicle routing strategy has been designed to minimise impacts across the highway network as set out within 7.3 Outline Construction Traffic Management Plan [APP-309]. This highlights the strategy and measures to reduce impacts to other road users from construction traffic related to the Project.</p> <p>The Applicant has undertaken a complete and full assessment of traffic routes being used by construction vehicles. Details are contained in 7.11 Transport Assessment [APP-333].</p> <p>6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] includes the assessment of the potential impacts of the Project, including changes in traffic flow, delays, road safety and impacts on walking, cycling and horse-riding on the roads along the Primary Access Routes located in the Local Road Network. 7.11 Transport Assessment [APP-333] examines capacity, safety, and operational efficiency of the network, identifying potential bottlenecks or safety concerns. Where required,</p>

Topic/Theme raised by Speakers	Applicant's Response
	<p>suitable mitigation measures have been proposed or are under discussion with the Local Highway Authority/National Highways to minimise likely adverse impacts.</p>
Impact on Public Rights of Way	<p>Through an iterative process of routeing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of Public Rights of Way (PRoWs). The overall strategy, as set out in 7.6 Outline PRoW Management Plan [APP-329], is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRoWs would be closed without a diversion in place, and no severance of the overall network is anticipated.</p> <p>Impacts, management proposals and indicative durations for each affected PRoW are contained in 7.6 Outline PRoW Management Plan [APP-329] and will be developed further into detailed, site-specific management measures and temporary diversions by the Applicant and its Main Works Contractor, based on detailed design information. These will be discussed with PRoW Officers at the relevant Local Highway Authorities during preparation of the final PRoW Management Plan and will be supported by Road Safety Audits where required. The final PRoW Management Plan will be submitted to, and approved by, the relevant planning authority. Where PRoWs interact with haul roads or construction activities, appropriate safety measures such as signage, speed controls, physical segregation where required, and contractor-managed crossings will be implemented in line with 7.6 Outline PRoW Management Plan [APP-329]. Advance signage and communication will be provided to ensure users are fully informed, and temporary PRoW closures and diversions will be coordinated with other local works to avoid concurrent impacts. All PRoWs will be reinstated as soon as practicable to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys. Notwithstanding the above, the Applicant will continue to engage with Local Highway Authorities and affected stakeholders as the detailed PRoW management arrangements are developed.</p>
Cumulative Effects	
Cumulative effects - general	<p>With regard to multiple developments proposed within East Anglia, the assessment of cumulative effects of each project in combination with other developments will be undertaken by each developer at a project level and detailed within each project's respective planning applications. The cumulative effects assessments undertaken by each project would be considered on their own merit in the context of legislative requirements as well as national and local planning policies by the relevant determining authorities, such as the respective Local Planning Authorities or the Secretary of State. Any such</p>

Topic/Theme raised by Speakers	Applicant's Response
	<p>application would be considered in accordance with planning policy and material considerations, such as scale, suitability, and interaction with other NSIPs.</p> <p>The Applicant has engaged with other developers who are proposing development in proximity of the Project to understand their requirements. Meetings have been held with the North Falls and Five Estuaries Offshore Wind Farm project teams. Both of these wind farms are proposed to be located off the coast of East Anglia and would connect into the proposed EACN Substation. Both projects involve the construction of new substations, which are proposed to be located adjacent to the EACN Substation. Project teams have worked collaboratively to reduce potential cumulative traffic effects should they be undertaken in parallel.</p> <p>Where there is certainty of a development (such as a new residential development, an offshore wind farm and its associated onshore equipment etc) being constructed, and there is adequate information in the public domain to understand the impacts of that development on the receiving environment, these have been considered within the cumulative effects assessment of the Project. The other developments listed are included within the long list of other developments for the cumulative effects assessment.</p> <p>The cumulative effects assessment follows Planning Inspectorate's Advice Note 17 'Cumulative Effects Assessment' and is presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. This has assessed the potential intra-project cumulative effects and inter-project cumulative effects. The detailed assessment of the Project with other developments can be found in 6.17.A3 Appendix 17.3 Inter-Project Cumulative Effects [APP-284]. The assessment of clusters of other developments on common receptors can be found in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281].</p>
Cumulative effects - around EACN	<p>The multiple developments that are proposed to connect to the Project within East Anglia, are assessed within 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] including North Falls. The Tarchon Interconnector project was not included within the cumulative assessment for the Project, as a cut-off date of 1 April 2025 was used to confirm the long list of cumulative developments to be assessed. The s35 Direction was not issued for the Tarchon project until 7 April 2025, however, since the 1 April the Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in Environmental Statement then these would be published into Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate). In addition, the Tarchon</p>

Topic/Theme raised by Speakers	Applicant's Response
	<p>Interconnector project will be required to undertake its own cumulative assessment with other developments as part of their respective DCO application.</p> <p>The Applicant has engaged with other developers who are proposing development in proximity of the Project to understand their requirements. Meetings have been held with the North Falls and Five Estuaries Offshore Wind Farm project teams. Both of these wind farms are proposed to connect into the proposed EACN Substation. Both projects involve the construction of new substations, which are proposed to be located adjacent to the EACN Substation. Project teams have worked collaboratively to reduce potential cumulative traffic effects should they be undertaken in parallel.</p> <p>A full list of cumulative developments considered are detailed within the long list of other developments (6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]). The cumulative effects assessment also follows Planning Inspectorate's Advice Note 17 'Cumulative Effects Assessment'.</p>
Cumulative effects - around Bramford Substation	<p>The intra-project cumulative effects assessment has been undertaken in accordance with 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297]. For intra-project effects, common receptors were identified (which included a review of landscape, ecology and historic receptors) and assessed within 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281].</p> <p>The inter-project effects assessment identifies significant cumulative effects on landscape and agricultural land; the proposed mitigation is set out in the 7.2 Outline Code of Construction Practice [APP-300] and 7.4 Outline Landscape and Ecological Management Plan [AS-046]. Significant cumulative effects are predicted during construction and operation (and maintenance) owing to the potential presence of construction works in the landscape, the introduction of additional overhead lines in the landscape connecting into Bramford Substation and the cumulative loss of agricultural land.</p>

Annex A Speakers and Raised Themes

Interested Party	Policy and Legislation		Alternative options													Cost		Consultation			Construction																				
	General green policy	Application of the NPS, Holford Rules and NPPF	Section 106 agreements	Strategic planning of energy infrastructure	Offshore	High voltage direct current (HVDC)	Ultra high voltage	Horns report and proposed deferral for 5 years	Reinforcement of existing lines	Underground cables	Alternative route/undergrounding in the Waveney Valley	Alternatives at For street, Aldham and Fordham	Alternatives that follow A12 corridor	Alternatives at Great and Little Waltham	Low height pylons near Great and Little Waltham	Alternatives at Colne Valley	Use of T Pylons	Location of EANC	Security and resilience of electrical infrastructure	Monetisation of environmental impacts / use of the green book	Whole life cost comparison	Devaluation of properties	Gunning and Equator principles	Consultation on alternatives	Engagement with landowners and communities	Impacts on communities	Impacts of haul road	Alternatives to stone haul road	Drainage of haul road	Working hours											
Open floor hearing 1 (Session 1)																																									
Essex Police/ Suffolk Police			Y																																						
Suffolk County Council						Y			Y													Y													Y						
Burstable Parish Council																	Y																								
Cotton Parish Council				Y	Y																					Y	Y														
Peter Finnie	Y																																								
Georgina Langton				Y																		Y				Y															
Simon Amstutz																																									
Caroline Blacker					Y				Y																																
Robert Willis																																									
Christopher Vermont						Y													Y	Y		Y	Y	Y																	
Joanne Elliott						Y																Y	Y	Y																	
Richard Davies/Ms Elliot																					Y																				
Clive Drewry				Y																			Y																		
Caroline Homewood	Y				Y						Y											Y																			
David Wass	Y			Y				Y	Y		Y				Y			Y	Y						Y																
Tamsin Fairley																																									
Graham Lucas																																									
Jane Lushington																			Y			Y																			
John Stacey	Y																						Y	Y	Y																
Open floor hearing 1 (Session 2)																																									
Bernard Jenkin MP				Y	Y												Y					Y																			
Babergh District Council					Y	Y												Y	Y																						
Mid Suffolk District Council				Y	Y	Y	Y	Y		Y								Y							Y																
Tharston and Hapton Parish Council									Y															Y	Y																
Pylons East Anglia				Y																					Y																
Villages against Pylons				Y													Y																								
Charlotte Banks																																									
Neil Lockett																		Y				Y	Y	Y																	
Catherine Rayner																						Y	Y	Y																	
John Rayner																							Y	Y																	
Karl Owen									Y									Y																							
Mr Buxton on behalf of Alexandra Macadam																																									
Paul Whittle																					Y																				
Gillian Whittle				Y													Y					Y	Y	Y																	
Andrew Bullock																							Y	Y	Y		Y	Y													
Susan Edwards				Y	Y	Y																	Y	Y																	
Mark Harper									Y										Y																						
Katharine Cockshaw					Y				Y								Y	Y					Y	Y																	
Richard Bullock																																									
Trevor Seddon				Y		Y			Y																																
James Nainby-Luxmoore	Y				Y	Y	Y												Y	Y		Y	Y																		
Dedham Vale Society	Y			Y	Y																		Y																		
Mr Spooner					Y							Y											Y	Y		Y															
Mr Marshall																																									

Interested Party	Agriculture and soils		Air quality	Ecology and biodiversity		Geology	Health and wellbeing		Historic environment		Flood Risk	Landscape				Noise	Socio-economics, Recreation and Tourism			Traffic and Transport		Cumulative effects							
	Soils and Best and Most Versatile Land	Agricultural businesses including severance	Impact on acid sulphate soils	Air pollution and dust	Biodiversity (inc tree loss)	Birds inc bird strike	Sterilisation of minerals	Health - general	Electromagnetic Fields	Historic environment - general	Listed buildings and conservation areas	Vibration impacts on listed buildings	Flood risk	Landscape and visual	Landscape mitigation and compensation	National Landscape - general	National Landscape -Special properties and compliance with 585	Impacts on the green belt	Noise impacts	Community benefits	Socio-economics, local economy and tourism	Skills and employment	Sterilisation of housing proposal	Impact on local roads	Impact on airfields	Impacts on Public rights of way	Cumulative effects - general	Cumulative effects - around EACN	Cumulative effects - around Bramford Substation
Open floor hearing 1 (Session 1)																													
Essex Police/ Suffolk Police																													
Suffolk County Council					Y										Y														
Burstable Parish Council																													Y
Cotton Parish Council	Y				Y			Y			Y		Y													Y			
Peter Finnie																													
Georgina Langton	Y																												
Simon Amstutz															Y	Y													
Caroline Blacker						Y																							
Robert Willis							Y				Y															Y			
Christopher Vermont																													
Joanne Elliott					Y	Y				Y					Y			Y											
Richard Davies/Ms Elliot	Y							Y																					
Clive Drewry	Y							Y																					
Caroline Homewood									Y	Y			Y																
David Wass					Y	Y			Y	Y		Y	Y			Y								Y			Y		
Tamsin Fairley	Y	Y																						Y			Y		
Graham Lucas																		Y					Y			Y	Y		
Jane Lushington																													
John Stacey	Y	Y					Y																						
Open floor hearing 1 (Session 2)																													
Bernard Jenkin MP															Y	Y													
Babergh District Council									Y	Y			Y	Y	Y	Y											Y		
Mid Suffolk District Council					Y		Y		Y	Y			Y	Y						Y			Y			Y		Y	
Tharston and Hapton Parish Council	Y	Y		Y	Y				Y														Y		Y	Y			
Pylons East Anglia	Y	Y			Y				Y			Y	Y																
Villages against Pylons															Y	Y													
Charlotte Banks										Y																			
Neil Lockett					Y					Y																	Y		
Catherine Rayner	Y																						Y						
John Rayner	Y				Y																								
Karl Owen					Y								Y														Y		
Mr Buxton on behalf of Alexandra Macadam	Y									Y																			
Paul Whittle																										Y		Y	
Gillian Whittle	Y	Y								Y			Y																
Andrew Bullock	Y	Y																											
Susan Edwards					Y				Y	Y																			
Mark Harper	Y								Y				Y																
Katharine Cockshaw	Y				Y	Y			Y			Y																	
Richard Bullock	Y																			Y									
Trevor Seddon										Y			Y																
James Nainby-Luxmoore					Y	Y																				Y			
Dedham Vale Society													Y	Y	Y														
Mr Spooner																													
Mr Marshall									Y	Y	Y														Y				

Interested Party	Policy and Legislation		Alternative options													Cost		Consultation			Construction											
	General green policy	Application of the NPS, Holford Rules and NPPF	Section 106 agreements	Strategic planning of energy infrastructure	Offshore	High voltage direct current (HVDC)	Ultra high voltage	Horns report and proposed deferral for 5 years	Reinforcement of existing lines	Underground cables	Alternative route/undergrounding in the Waveney Valley	Alternatives at Forstreet, Aldham and Fordham	Alternatives that follow A12 corridor	Alternatives at Great and Little Waltham	Low height pylons near Great and Little Waltham	Alternatives at Colne Valley	Use of T Pylons	Location of EANC	Security and resilience of electrical infrastructure	Monetisation of environmental impacts / use of the green book	Whole life cost comparison	Devaluation of properties	Gunning and Equator principles	Consultation on alternatives	Engagement with landowners and communities	Impacts on communities	Impacts of haul road	Alternatives to stone haul road	Drainage of haul road	Working hours		
Open floor hearing 2																																
Chelmsford City Council			Y	Y				Y				Y	Y		Y																Y	
Tendring District Council		Y																												Y		
Ardleigh Parish Council	Y		Y	Y		Y										Y	Y					Y	Y	Y								
Terrance Leonard Nichols																							Y									
Jenny Nichols																				Y			Y									
Little Bromley Parish Council			Y	Y		Y											Y					Y			Y							
North-West and South-West of Chelmsford Parishes Group	Y			Y	Y									Y									Y	Y								
Tritton Farming Partnership LLP	Y													Y										Y								
Brett Aggregates Limited																								Y								
Land agent (Whirlledge & Nott Chartered Surveyors)																								Y								
Land agent on behalf of Essex Scouts and Guides																								Y								
Suzanne Bolwell-Davies	Y																Y					Y	Y		Y							
Graeme Crook			Y	Y	Y	Y		Y													Y	Y	Y		Y			Y				
William Doran			Y	Y	Y			Y											Y	Y	Y											
Aldham Parish Council	Y		Y	Y										Y	Y							Y	Y	Y	Y						Y	
Helen Pardoe													Y																			
Charles Micklem	Y												Y	Y								Y	Y									
Jenny Micklem	Y												Y	Y					Y			Y	Y									
Mark Pym																	Y	Y														
Councillor Michael Steel													Y	Y									Y									
Nicola Maguire			Y	Y	Y			Y											Y	Y		Y										
Paul Lanham																								Y								
Peter Wislocki		Y																					Y									
Open floor hearing 3																																
Adrian Ramsay MP			Y	Y		Y			Y								Y			Y		Y	Y									
Norfolk County Council			Y			Y			Y												Y	Y										
Roydon Parish Council	Y								Y																	Y						
Tacolneston Parish Council								Y													Y				Y							
Heron Meadow Care Centre and Community Interest Company																					Y											
Nicholas Cheeseman																								Y								
Matthew Day																				Y	Y	Y	Y			Y						
Karen Fisher	Y																			Y					Y							
Mike Juby			Y	Y					Y														Y									
Nicola Moore																				Y			Y									
Graham Moore																							Y	Y								
Gillian Palmer																							Y	Y								
Phillip Palmer																						Y	Y									
Graeme Piercy				Y																		Y	Y									
Linda Smith	Y			Y																		Y	Y									
Norman Stevens	Y																								Y		Y					

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