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Norwich to Tilbury

Volume 8: Examination Documents

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Final Issue A

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1. Introduction

1.1 Purpose of this Document

- 1.1.1 This document has been prepared by National Grid Electricity Transmission plc ('the Applicant') to provide comments on the Local Impact Reports submitted by Local Authorities in response to the application for development consent for the Norwich to Tilbury project ('the Project').
- 1.1.2 A total of ten individual Local Impact Reports were submitted to the Examining Authority (the ExA) by Deadline 1 of the Examination (26 February 2026). As requested by the ExA's 17 February 2026 letter, **Rule 8 - Notification of timetable for the Examination [PD-011]**, the Applicant has provided this response document at Deadline 2 of the Examination.
- 1.1.3 Whilst neighbouring as well as host Local Authorities are able to submit Local Impact Reports¹, only host Local Authorities have submitted a report in relation to the Project's application for development consent. As set out in Table 4.1 of **5.1 Consultation Report [APP-066]**, there are 13 host Local Authorities for the Project. There are ten Local Impact Reports, as Basildon Borough Council did not submit one and Suffolk County Council, Babergh District Council and Mid Suffolk District Council have submitted a joint Local Impact Report.

1.2 Approach to Responding to Local Impact Reports

- 1.2.1 The Applicant began a process to review and consider the Local Impact Reports shortly prior to their publication on the Planning Inspectorate's website on 3 March 2026, as the Local Authorities shared their final Local Impact Reports with the Applicant when they submitted them to the Planning Inspectorate. The Applicant thanks the Local Authorities for their assistance. The Applicant initiated this multi-disciplinary review prior to publication due to their awareness of the number and size of the Local Impact Reports, and as a result of the regular engagement maintained with each Local Authority.
- 1.2.2 The Applicant has responded to the ten Local Impact Reports in this single document (rather than through ten documents) to support an efficient examination. This single document evidences the Applicant's consideration of impacts raised by the Local Authorities in their Local Impact Reports, including any similar matters raised in multiple separate Local Impact Reports. It therefore minimises duplication of text as well as the requirement for the ExA and interested parties including the Local Authorities to read across separate documents to understand the Applicant's response as a whole to all impacts raised on a topic.
- 1.2.3 Nonetheless, in producing this document, the Applicant has reviewed and considered the entire content of each of the Local Impact Reports submitted to the ExA. Given

¹ Planning Act 2008 section 56A <https://www.legislation.gov.uk/ukpga/2008/29/section/56A> as explained in Planning Inspectorate Guidance *Nationally Significant Infrastructure Projects: Advice for Local Authorities* <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-for-local-authorities#impact> [Both resources accessed 2 March 2026]

the size of the Local Impact Reports and the time provided within the examination timetable to respond, together with the Applicant's recent regard to the relevant representations submitted by each Local Authority (as evidenced in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**), this document does not aim to provide detailed comment on each issue raised in each of the Local Impact Reports. Rather, the Applicant has analysed each Local Impact Report to identify and ensure commentary is provided on new impacts raised, impacts previously raised where new information is provided, or content in the Local Impact Report that the Applicant wishes to provide a clarification on.

- 1.2.4 As a general point, the Applicant already has considered matters raised in the Local Impact Reports in the documents contained in their application for development consent and in their documents submitted in pre-examination or during the examination stage to date. The Applicant maintains that this suite of submitted documents being and in relation to their application for development consent not only provides the evidence for their consideration of Project impacts, but also their analysis of them and sets out their proposals for the control and mitigation of impacts. Where applicable, this document references other documents the Applicant already has submitted to identify where there is existing consideration of an impact raised in one of more Local Impact Reports. Where other documentation has been referred to, Examination Library references are provided. However, to prevent repetitive referencing of the Local Impact Reports, Statements of Common Ground and the Applicant's Comments on Relevant Representations, Examination Library references for these documents are provided in Table 1.1 of this document.

1.3 Engagement with Local Authorities

- 1.3.1 The Applicant has engaged with the host local authorities, relevant statutory organisations, third party developers and other parties as appropriate throughout the development of the Project, and continues to do so during the examination process. Most recently this has included a number of meetings to discuss specific topics ahead of updating the Statements of Common Ground for Deadline 1. The Statements of Common Ground are an iterative process and provide a snapshot in time of the current position. The Applicant values the positive and productive working relationship with the representatives of each authority and has worked to address comments and concerns within the timeframes possible. We note the comments from Essex County Council within Section 1.3 of their Local Impact Report and have spoken regularly with the council to address their concerns. We look forward to continuing to work with each organisation to progress the Statements of Common Ground further ahead of Deadline 4.

1.4 Structure of this Document

- 1.4.1 Chapter 2 provides an overview of how the legal and policy framework applies to a considerable number of impacts that the Local Authorities have raised in their Local Impact Report. It also demonstrates that the mitigation hierarchy has been central to Applicant's development of the Project since 2022, particularly the routeing and siting decisions.
- 1.4.2 Chapter 3 covers overarching topics that have been raised by one or more Local Authorities and the Applicant's response. This chapter predominately considers topics not specific to a geographical area, or locations that have been referred to by

multiple Local Authorities or the Applicant recognises are a key concern of a single Local Authority. The headings for each section within this chapter align with the terminology used in the ExA's Initial Assessment of Principal Issues (IAP), as set out in Annex C of the **ExA's Rule 6 letter - Notification of the Preliminary Meeting and matters to be discussed [PD-009]**, to the extent that the scope of that section is found within the IAP List of Issues. Other sections within this chapter are closer aligned to the Integral Issues listed in Annex C of the Rule 6 Letter.

- 1.4.3 Chapter 4 covers impacts in relation to the topics covered by the Project's Environmental Statement, following the order these topics are listed in **6.1 Environmental Statement Chapter 1 - Introduction [APP-123]**, as well as planning policy to the extent it has not already been considered in Chapter 3. The headings for each section within this chapter align with the terminology used in the IAP, with the topic names used in the Applicant's Environmental Statement (ES) provided in brackets if they differ.
- 1.4.4 Appendix A provides a table for each Local Authority. Each table evidences where in this document or in other documents the Applicant has produced in relation to their application for development consent the Applicant has considered the points raised by that Local Authority in their Local Impact Report.

1.5 Examination Document References - Local Authority Documents

- 1.5.1 Table 1.1 below sets out the Examination Library references for each Local Impact Report. It also includes the Examination Library, and where relevant application document references for Statements of Common Ground, Relevant Representations and the Applicant's Response to Relevant Representations, where these documents relate to Local Authorities.

Table 1.1 Examination Document References - Local Authority Documents

Local Authority	Statement of Common Ground Applicant Reference	Version	Examination Library Reference²	Relevant Representation (Examination Library Reference)	8.4.1 Applicant's Comments on Relevant Representations [REP1- 132] – Table Number	Local Impact Report (Examination Library Reference)
Norfolk County Council	5.9.1	B	REP1-010	RR-2753	Table W1.1	REP1-173
Suffolk County Council	5.9.2	B	REP1-012	RR-3520	Table AB1. 1	REP1-178 & REP1-179 (appendices)
Essex County Council	5.9.3	B	REP1-014	RR-1083	Table O1.1	REP1-161
Thurrock Council	5.9.4	B	REP1-016	RR-3665	Table AE1.1	REP1-187
South Norfolk District Council	5.9.5	B	REP1-018	RR-3417	Table AA1.1	REP1-176
Babergh District Council and Mid Suffolk District Council	5.9.6	B	REP1-020	RR-0314 and RR-2540 (identical)	Table C1.1	REP1-178 & REP1-179 (appendices)
Tendring District Council	5.9.7	B	REP1-022	RR-3608	Table AD1.1	REP1-182
Colchester City Council	5.9.8	B	REP1-024	RR-0676	Table I1.1	REP1-156
Braintree District Council	5.9.9	B	REP1-026	RR-0383	Table E1.1	REP1-148
Chelmsford City Council	5.9.10	B	REP1-028	RR-0545	Table H1.1	REP1-153
Brentwood Borough Council	5.9.11	B	REP1-030	RR-0391	Table F1.1	REP1-150
Basildon Borough Council	5.9.12	B	REP1-032	RR-0335	Table D1.1	N/A

² References have been provided to clean versions, rather than tracked change versions

2. Overarching Policy Context

2.1 Introduction

- 2.1.1 The issues raised in the Local Impact Reports are to be considered within the overall decision-making and policy framework. This section provides the overarching policy context to the matters raised to avoid repetition of policy in the responses in Chapter 3 (Overarching Topics) and Chapter 4 (Planning and Environmental Topics) of this document. Full details of the planning policy assessment in respect of the Project are contained in **5.6 Planning Statement [APP-085]**.
- 2.1.2 This section therefore provides an overview of the following:
- a) Section 104 Decision-Making and the NPS Policy Framework
 - b) The clear and urgent need for the Project
 - c) The CNP further presumption applicable to the Project
 - d) How a constant and strong focus on the mitigation of impacts through the Mitigation Hierarchy has been central to Applicant's development of the Project since 2022, particularly the routeing and siting decisions
 - e) Compensation and Enhancement/Furtherance
 - f) The Applicant's Assessment of the Planning Balance in respect of Residual Effects after the application of the Mitigation Hierarchy.

2.2 S104 & General EN-1 Presumption

- 2.2.1 Pursuant to Section 104(3) of the Planning Act 2008 ('PA 2008'), the Application must be decided in accordance the relevant National Policy Statement(s) ('NPS') except to the extent that one or more of the subsections (4) to (8) applies. Further to the transitional arrangements applicable to the Application, the relevant NPSs to the Project for the purposes of Section 104(3) are EN-1, EN-3 and EN-5 (January 2024). The recently adopted updated EN-1, EN-3 and EN-5 (January 2026) are important and material considerations.
- 2.2.2 Section 104(2) states that in deciding an application for development consent the Secretary of State must have regard to:
- Any relevant National Policy Statement
 - The appropriate marine policy documents
 - Local impact reports
 - Prescribed matters
 - Any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision.
- 2.2.3 In deciding the Application in accordance with Section 104(3) of the PA 2008 the Secretary of State must be satisfied that Section 104(7) does not apply: *'the adverse*

impacts of the proposed development would outweigh its benefits’. To determine this, a balance of the Project’s adverse impacts against its benefits must be carried out. This is addressed in Section 8 of **5.6 Planning Statement [APP-085]** (in particular see Section 8.2).

- 2.2.4 Section 7 of **5.6 Planning Statement [APP-085]** details the Project’s compliance with the NPSs. The accompanying **5.7 Policy Compliance Document [APP-086]**, updated in February 2026 as **8.4.2 Policy Compliance Tracker [REP1-133]**, demonstrates that the Project is in accordance with these NPSs.
- 2.2.5 Section 3 of EN-1 sets out the urgent need for significant amounts of new large-scale low carbon energy infrastructure to meet the government’s energy objectives, with paragraph 3.2.6 stating that:
- ‘3.2.6 The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure, which is urgent, as described for each of them in this Part.’*
- 2.2.6 Pursuant to 3.2.7 of EN-1, “*substantial weight*” should be given to the need for energy infrastructure when considering applications for development consent.
- 2.2.7 Paragraphs 3.3.65 to 3.3.66 of EN-1 further state (our emphasis):
- ‘3.3.65 There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives.*
- 3.3.66 The security and reliability of the UK’s current and future energy supply is highly dependent on having an electricity network which will enable new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security. The delivery of this important infrastructure also needs to balance cost to consumers, accelerated timelines for delivery and the minimisation of community and environmental impacts.’*
- 2.2.8 Paragraph 4.2.6 of EN-1 reiterates the substantial weight to be given to the need for energy infrastructure (our emphasis):
- ‘4.2.6 The overarching need case for each type of energy infrastructure and the **substantial weight** which should be given to this need in assessing applications, as set out in paragraphs 3.2.6 to 3.2.8 of EN-1, is the starting point for all assessments of energy infrastructure applications.’*
- 2.2.9 Paragraph 4.1.3 of EN-1 sets out a presumption in favour of granting consent for energy Nationally Significant Infrastructure projects (‘NSIPs’) (our emphasis):
- ‘4.1.3 Given the level and urgency of need for infrastructure of the types covered by the energy NPSs set out in Part 3 of this NPS, the Secretary of State will start with a **presumption in favour of granting consent** to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused.’*
- 2.2.10 In determining the Application, there remains an overall planning balance that must be considered. Paragraph 4.1.5 of EN-1 provides:
- ‘4.1.5 In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account:*

- *its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits*
- *its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy'*

- 2.2.11 The critical national priority ('CNP') policies (detailed below) contain a further presumption for CNP infrastructure which address how residual effects remaining after the application of the mitigation hierarchy are to be considered in the planning balance.
- 2.2.12 The 2026 EN-1 and EN-5 now set out the government's commitment to the Clean Power Action Plan 2030, which aims for at least 95% of the UK's electricity generation to come from clean sources by 2030 and emphasises the urgency and critical national priority of developing low-carbon infrastructure, thereby supporting the need case for the Project.
- 2.2.13 The 2026 EN-1 and EN-5 maintain the assessment principles and generic impact considerations outlined in the 2024 EN-1 and EN-5, ensuring continuity in evaluating environmental effects. They also introduce enhanced guidance on biodiversity, flood risk, and climate resilience and the mitigation hierarchy. The Environmental Statement ('ES') is in compliance with these 2026 NPSs.
- 2.2.14 The Applicant's assessment of the planning balance is contained in Chapter 8 of the **5.6 Planning Statement [APP-085]**, following a detailed assessment of the Project and its likely effects. An overview is provided in Section 2.7 below.

2.3 Need and Regulatory Duties

- 2.3.1 The technical need case for the reinforcement of the East Anglia and South East Transmission System is fully set out in the **7.17 Strategic Options Backcheck Review [APP-355]**. A further response on the quantified technical system deficits and the regulatory requirement to facilitate generation is set out in the overarching theme chapter on need case/timings (see Chapter 3 – Overarching Themes).
- 2.3.2 The need case is much more than meeting capacity requirements and our regulatory duties to customers.
- 2.3.3 EN-1 identifies an urgent national need for electricity infrastructure, which is required in the national interest to be delivered as soon as possible. Electricity infrastructure of the type proposed CNP Infrastructure, which is so urgent and important it should be progressed as quickly as possible.
- 2.3.4 EN-1 confirms that CNP Infrastructure is required to ensure the UK can achieve our energy objectives, together with the national security, economic, commercial, and net zero benefits of providing a secure, reliable, and affordable supply of energy, while also meeting our decarbonisation targets:
- The need for security of supply (energy independence due to geo-political instability is critical during heightened security-of-supply exposure post Ukraine)
 - The need to meet a net zero and clean energy commitment of which this project is a critical pathfinder

- The need to meet the decarbonisation challenge in the UK (aside from the main net zero policy)
- The need to deliver economic growth to which CNP Infrastructure contributes as a growth vector itself and as a facilitator.

2.3.5 Section 3 of EN-1 confirms there is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives and substantial reinforcement is required in East Anglia:

“3.3.66 The security and reliability of the UK’s current and future energy supply is highly dependent on having an electricity network which will enable new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security.”

“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...substantial reinforcement in East Anglia to handle increased power-flows from offshore wind generation”.

“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.”

2.3.6 The Project is identified as critical to delivering a network which supports the clean power pathways for 2030. There is a need to avoid inevitable greater constraint payments - Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031. Consequently there is a need for the Project to be delivered at pace to achieve the Clean Power 2030 target for the significant benefits to be realised.

2.3.7 Given the project is urgent and critical in the national interest this leads into the requirement on decision makers in relation to the acceptance of need (emphasis as shown in EN-1):

‘3.2.6 The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent, as described for each of them in this Part.

3.2.7 In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008.

3.2.8 The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS’

2.4 CNP Policies:

2.4.1 EN-1 further provides that there is a CNP for the provision of nationally significant low carbon infrastructure. As an electricity grid infrastructure project, the Project qualifies as CNP under paragraphs 4.2.4 and 4.2.5 of EN-1:

‘4.2.4 Government has therefore concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure.

4.2.5 This does not extend the definition of what counts as nationally significant infrastructure: the scope remains as set out in the Planning Act 2008. Low carbon infrastructure for the purposes of this policy means:

...

- *for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System’*

2.4.2 Paragraph 3.3.63 of EN-1 confirms (emphasis added):

*‘3.3.63 ...the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. **Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.**’*

2.4.3 Paragraph 4.1.7 of EN-1 provides a further presumption in favour of grant that is applicable to CNP infrastructure:

*‘4.1.7 Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the Secretary of State considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development. **For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases.** This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.’*

2.4.4 Paragraphs 4.2.6-4.2.8 of EN-1 provide that the CNP policy does not create an additional need case beyond what is already provided in EN-1 but is relevant specifically in reference to consideration of residual effects in Secretary of State decision-making (the detail of how this applies is set out in 4.2.15-4.2.17):

‘4.2.6 The overarching need case for each type of energy infrastructure and the substantial weight which should be given to this need in assessing applications, as

set out in paragraphs 3.2.6 to 3.2.8 of EN-1, is the starting point for all assessments of energy infrastructure applications.

4.2.7 *The CNP policy does not create an additional or cumulative need case or weighting to that which is already outlined for each type of energy infrastructure. **The policy applies following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy.** As such, it is relevant during Secretary of State decision making and specifically in reference to any residual impacts that have been identified. It should therefore also be given consideration by the Examining Authority when it is making its recommendation to the Secretary of State.*

4.2.8 *During decision making, the CNP policy will influence how non-HRA and non-MCZ residual impacts are considered in the planning balance. The policy will therefore also influence how the Secretary of State considers whether tests requiring clear outweighing of harm, exceptionality, or very special circumstances have been met by a CNP Infrastructure application. Further detail is provided in paragraphs 4.2.15 to 4.2.17, and Figure 2.'*

2.4.5 None of the exceptions in paragraph 4.1.7 apply to NTT (this is addressed in the **5.6 Planning Statement [APP-085]**). Therefore, when the non-HRA (Habitats Regulation Assessment) and non-MCZ (Marine Conservation Zone) residual effects of CNP after mitigation are to be weighed against the benefit/need and the benefit/need for the Project will outweigh the residual effects (and so consent should be granted) in 'all but the most exceptional cases'.

2.4.6 This is followed by paragraphs 4.2.15 - 4.2.17 of EN-1, which highlight the strength of the **further presumption applicable to CNP** (i.e. in addition to the presumption in para 4.1.3) in relation to any tests set out within the NPSs, or any other planning policy, that apply to a DCO application for CNP (emphasis added):

*'4.2.15 **Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts.** The exception to this presumption of consent are residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.*

4.2.16 *As a result, the Secretary of State will take as the starting point for decision-making that **such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.***

4.2.17 *This means that the Secretary of State will take as a starting point that CNP Infrastructure **will meet the following, non-exhaustive, list of tests:***

- *where development within a **Green Belt** requires very special circumstances to justify development;*
- *where development within or outside a **Site of Special Scientific Interest (SSSI)** requires the benefits (including need) of the development in the location proposed*

to clearly outweigh both the likely impact on features of the site that make it a SSSI, and any broader impacts on the national network of SSSIs.

- *where development in nationally designated landscapes requires exceptional circumstances to be demonstrated; and*
- *where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.'*

2.4.7 These policies in paragraphs 4.2.16-4.2.17 of EN-1 require the Secretary of State to take as a starting point for decision-making for CNP infrastructure as though it has met any test within the NPS (or any other planning policy) which requires outweighing of harm, including in highly protected spaces like the Green Belt, National Landscapes and SSSI areas. In other words, the Secretary of State will take as their starting point that the bar for such tests has been cleared by virtue of a project being CNP.

2.5 Mitigation Hierarchy:

Overview

- 2.5.1 The mitigation hierarchy has been systematically applied throughout the design of the Project. This is set out in **6.3 Environmental Statement Chapter 3 – Alternatives [APP-127]**, **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**, **6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135]** and **5.6 Planning Statement [APP-085]**.
- 2.5.2 **5.15 Design Development Report [APP-122]** sets out from paragraph 2.5.2 the basis for consulting on the Project at the routing selection stage. The reasons for not preferring reasonable alternatives with regards to the requirement of s14(2)(d) and paragraph 2 of schedule 4 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') and the policy guidance in both EN-1 and EN-5 (including that they fail to meet National Grid's statutory duties) are set out in **6.3 Environmental Statement Chapter 3 – Alternatives [APP-127]** at 3.2.25. Strategic through to localised design variants have also been considered in the various reports describing the selection and backchecking of the strategic option and the development of the routing and siting of the Project including:
- **7.17 Strategic Options Backcheck and Review [APP-355]**
 - **7.18 2022 - Corridor and Preliminary Routing and Siting Study [APP-356]**
 - **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**
 - **7.20 2023 - Design Development Report for the Project [APP-358]**
 - **7.21 2024 - Design Development Report for the Project [APP-359]**
 - **7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360]**.
- 2.5.3 Alternatives and routing are also addressed in the **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]**.
- 2.5.4 There has been an extensive and iterative process of routing and site selection with wide levels of public and stakeholder engagement. Details of the pre-application

consultation process are set out in Section 3 of the **5.1 Consultation Report [APP-066]**.

- 2.5.5 The mitigation hierarchy is a stepped process that helps development projects to address potentially adverse effects on the environment. EN-1 states '*... the applicant must set out information on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy*'. The EIA Regulations (14(2)(c)) also require an ES to include '*a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment*'.
- 2.5.6 The mitigation hierarchy has been applied to the Project throughout the iterative design process and with the following considered:
- g) Avoid – the first step of the mitigation hierarchy comprises mitigation measures taken to avoid creating effects from the outset, such as careful spatial placement of infrastructure away from receptors, or timing construction sensitively to avoid their disturbance
 - h) Prevent – these include measures to remove the effect at source or disrupt the impact pathway – such as adopting standard pollution prevention techniques in line with good practice to prevent watercourses becoming polluted
 - i) Reduce – these are measures taken to reduce the duration, intensity and/or extent of effects that cannot be completely avoided for example landscape planting around the permanent assets such as at the CSE compounds and the proposed new EACN Substation and Tilbury North Substation
 - j) Offset (sometimes referred to as compensate) – where relevant and appropriate to the specific effect, these measures aim to compensate for any residual, adverse effects after full implementation of the previous three steps of the mitigation hierarchy an example is individual tree replacement at a 3:1 ratio with some inside the Order Limits where space allows and some outside of the Order Limits. Please see also Section 6 below in relation to compensation.
- 2.5.7 Each topic chapter of the ES has identified proposed mitigation measures (which could fall under 'Avoid', 'Prevent' or 'Reduce') that are required to address potential significant adverse effects of the Project, following the mitigation hierarchy. Mitigation is categorised as follows:
- a) Embedded Mitigation Measures: are those that are intrinsic to and built into the design of the Project
 - b) Standard Mitigation Measures: comprising management activities and techniques that would be implemented throughout construction of the Project to limit effects through adherence to good site practices. These are included in the 7.2 Outline Code of Construction Practice [Revision B]
 - c) Additional Mitigation Measures: mitigation measures over and above embedded and standard mitigation measures to reduce environmental effects. This includes, but is not limited to, mitigation required for protected species.
- 2.5.8 Mitigation measures have been defined within each environmental topic chapter and where relevant to construction and post-construction are detailed in:

- a) **7.2 Outline Code of Construction Practice [Revision B]** secured by Requirement 4 in **3.1 Draft Development Consent Order [APP-056]**
- b) **7.3 Outline Construction Traffic Management Plan [APP-309]** secured by Requirement 4 in **3.1 Draft Development Consent Order [APP-056]**
- c) **7.6 Outline Public Rights of Way Management Plan [APP-329]** secured by Requirement 4 in **3.1 Draft Development Consent Order [APP-056]**
- d) **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** secured by Requirement 5 in **3.1 Draft Development Consent Order [APP-056]**
- e) Environmental mitigation that relates to the permanent assets is detailed in **7.2 Outline Code of Construction Practice [Revision B]** and the **7.4 Outline Landscape and Ecological Management Plan [Revision C]** secured by Requirement 4 of **3.1 Draft Development Consent Order [APP-056]**.

Alternatives, Routeing and Site Selection

- 2.5.9 The adopted design approach is set out within **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the Application.
- 2.5.10 The assessment of alternatives for the Project was undertaken as part of a structured project development process that integrated technical assessment with stakeholder engagement. The key stages and their relationship to the alternatives assessment were:
 - a) April 2022: **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]** (CPRSS) identifying preferred strategic proposal to meet the defined need and corridor options
 - b) **April–June 2022**: Non-statutory consultation on preferred corridor options and graduated swathes for the Project. See **7.18 2022 - CPRSS [APP-356]** published at the 2022 non-statutory consultation
 - c) June 2023: **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** validating strategic approach
 - d) **June 2023: 7.20 2023 - Design Development Report for the Project [APP-358]** documenting design changes considered following 2022 consultation feedback
 - e) **June–August 2023**: Non-statutory consultation on 2023 preferred draft alignment with proposed infrastructure locations
 - f) **April 2024**: Updated Strategic Options Backcheck and Review (National Grid, 2024) validating strategic approach
 - g) **April 2024: 7.21 2024 - Design Development Report for the Project [APP-359]** documenting design changes considered following 2023 consultation feedback
 - h) **April–July 2024**: Statutory consultation on 2024 preferred draft alignment with Preliminary Environmental Information Report

- i) **March 2025:** Targeted statutory and non-statutory consultation on proposed changes following statutory consultation including change to Tilbury connection arrangements
- j) **July 2025: 5.15 Design Development Report [APP-122]** issued with DCO submission to report on the feedback received to the 2024 statutory consultation and to the targeted statutory and non statutory consultations held in 2025.

2.5.11 This timeline demonstrates how the strategic work identified the Project and how alternatives assessment evolved through iterative design development of the Project, with each Project consultation document building upon previous assessments and incorporating stakeholder feedback. The wider strategic framework for the Project was reviewed via the Strategic Options Backcheck Review to ensure need case is met. The documents listed above provide the detailed technical evidence base that underpins the alternatives, routeing and site selection assessment that has been undertaken as part of the design evolution for the Project.

2.5.12 At the routeing and siting stage, the Project design process was informed by the guidance of the Holford and Horlock Rules to avoid and reduce impacts where possible. These established guidelines informed the evaluation criteria and how the mitigation hierarchy was applied during the options selection process. Further details are set out in **5.6 Planning Statement [APP-085]** (see Section 7.2).

2.5.13 The feedback received through consultations has informed how the proposals have been developed, as set out in **7.20 2023 - Design Development Report for the Project [APP-358]**, **7.21 2024 - Design Development Report for the Project [APP-359]**, **7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360]** and the final **5.15 Design Development Report [APP-122]**. This includes (but is not exhaustive):

- Alternative technology (e.g. undergrounding)
 - a) Underground cables are proposed in four locations, including through the Dedham Vale National Landscape. The Dedham Vale National Landscape is a nationally important and designated landscape. With the proposed underground cable, the effects on views and setting would be reduced. This would also reduce effects on the setting of heritage assets located within the National Landscape. In all areas where underground cables have been proposed as a part of the Project, this has been after the local environment and habitats have been assessed, and the mitigation hierarchy and mitigation measures applied to reduce the impacts as far as possible, and where the selection of cable is required by technical considerations (e.g. crossing another 400 kV overhead line) or selection is justified by the relevant tests in EN-5.
- Reduction of wirescape through distribution network rationalisation / undergrounding
 - b) Prior to the commencement of construction works for the Project, several existing overhead and underground third-party services would need to be diverted, removed, undergrounded, or protected. The Project would follow the route of existing 132 kV overhead lines north of Flowton and north of Mellis, where the existing 132 kV overhead lines would be undergrounded. In other locations replacement of existing 132 kV is proposed to reduce cumulative wirescape. The proposed dismantling of circa. 23 km of existing UKPN 132 kV Overhead Line will reduce Landscape and Visual effects.

- Use of Other Pylon types (Low Height Lattice and T-pylons)
- c) The application of the mitigation hierarchy has also included consideration of alternative pylon types, of which two are available, low height lattice pylons and the T-Pylon. Consideration has been given to the use of low height pylons in circumstances where standard lattice pylons are considered to be inconsistent with policy. Low height lattice pylons have been proposed as necessary to reduce effects in two locations, to the north-west of Little Waltham and to the east of Thurrock airfield.
- d) 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 (see Appendix A of the **7.21 2024 – Design Development Report for the Project [APP-359]** where there may be a design preference for the use of T-pylons, the need to mitigate for unacceptable effects from lattice pylons is not engaged. On this basis T-pylons are not proposed for the Project.

- 2.5.14 Please see **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]** for further details of the Applicant's submissions in respect of the approach taken in relation to Alternatives.
- 2.5.15 EN-1 identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible. In terms of the consideration of alternatives as part of the examination of the substantive case, EN-1 indicates, first, that the consideration of alternatives should be carried out in a proportionate manner, and, second, that only alternatives that can meet the objectives of the proposed development need to be considered.
- 2.5.16 Paragraph 4.3.23 of EN-1 explains that the Secretary of State will be guided by whether there is a realistic prospect of the suggested alternative delivering the same infrastructure capacity, the same energy security, the same climate change, and the same environmental benefits as the proposal in the same timescale as the proposed development.
- 2.5.17 Paragraph 2.9.21 of EN-5 says that overhead line should be the strong starting presumption for electricity network developments in general. That strong starting presumption is reversed, but is only reversed for nationally designated landscapes. It is not displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea where their benefits clearly outweigh any extra economic, social or environmental impacts, applying the test set out in EN-5. The Applicant has applied the strong starting presumption of overhead lines in the correct places, and it has reversed that presumption in the circumstances of the National Landscape.

Residual Effects after Application of the Mitigation Hierarchy

- 2.5.18 'Residual effects' are those significant environmental effects that remain following the implementation of all embedded mitigation (design measures), standard mitigation (secured through the **7.2 Outline Code of Construction Practice [Revision B]**), and additional mitigation (secured through the draft DCO Requirements).

- 2.5.19 **6.18 Environmental Statement Chapter 18 – Summary [APP-287]** identifies which environmental topics have significant residual effects following the application of mitigation measures.
- 2.5.20 Table 2.1 below provides a summary showing that significant residual effects are limited to five topic areas: Landscape and Visual, Historic Environment, Agriculture and Soils, Socioeconomics (specific sites), and Traffic (construction phase only). Six topics have no significant residual effects, following the application of the mitigation hierarchy. It is important to note that for those topics where, after application of the mitigation hierarchy, some residual effects remain, the application of the mitigation hierarchy has still led to effective mitigation.

Table 2.1 Summary of Significant Residual Effects by Environmental Topic

Environmental Topic	Significant Residual Effects?	Nature of Effect	ES Reference
Air Quality	No	No significant residual effects	6.7
Ecology and Biodiversity	No	No significant residual effects	6.8
Contaminated Land, Geology and Hydrogeology	No	No significant residual effects	6.9
Health and Wellbeing	No	No significant residual effects	6.10
Hydrology, Land Drainage and Flood Risk	No	No significant residual effects	6.12
Noise and Vibration	No	Construction: Large adverse magnitude, major adverse effect construction traffic noise on Bentley Road	6.14
Landscape and Visual	Yes	Construction: Significant effects on all LCTs/LCAs which would be directly affected by construction activity within the Order Limits of the Project Significant adverse effects during construction are predicted for visual receptors (residents, recreational receptors and road users) within all of the Visual Receptor Areas (VRAs) that would be directly affected by construction activity within the Order Limits. These significant effects are related to the introduction of construction activity into close to medium distance views. Significant effects are expected to extend up to approximately 1.5 km in some instances, for example where there are open, elevated and/or wide views towards construction activity. In some VRAs significant effects would be more contained, for example where views of construction activity would be filtered and screened by vegetation or topography.	6.13

Environmental Topic	Significant Residual Effects?	Nature of Effect	ES Reference
		Moderate adverse effects on special qualities within DVNL Operation: Significant effects on 38 LCTs/LCAs (Year 15) Major or moderate adverse effects on visual receptors within 71 VRAs.	
Historic Environment	Yes	Operation: Moderate adverse effects on setting of 29 non-designated heritage assets Predicted likely significant effect on 41 designated heritage assets due to changes in their settings that affect their values during the operational (and maintenance) phase of the Project. Construction: Predicted likely significant effect on 157 designated heritage assets due to changes in their settings that affect their values during the construction phase of the Project. Predicted likely significant effect on 76 non-designated heritage assets due to changes in their settings that affect their values or due to physical impacts during the construction phase of the Project.	6.11
Agriculture and Soils	Yes	Construction/Operation: Temporary and permanent loss of approximately 172 ha of BMV agricultural land	6.6
Socioeconomics, Recreation and Tourism	Yes	Operation: Moderate-major adverse effects on specific sites	6.15
Traffic and Transport	Yes	Construction: Temporary moderate/large adverse effects at 12 PARs	6.16

2.6 Compensation and Enhancement / Furtherance

- 2.6.1 As part of offsetting within the mitigation hierarchy, paragraph 4.2.12 of EN-1 states *“Applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success and that action is taken.”*
- 2.6.2 It is important to note that paragraph 4.2.25 of the new EN-1 (January 2026) provides further clarity with the addition of the following sentence *“Compensation, by definition, does not reduce an adverse effect resulting from a development”*.
- 2.6.3 Whilst compensation is part of the mitigation hierarchy, EN-1 or EN-5 do not state that all residual effects must be compensated for or that any compensation measure proposed must be accepted if there are residual effects. 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.
- 2.6.4 The residual 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 CNP presumption in section 4.2 of EN-1.
- 2.6.5 The NPS position in relation to compensation is also consistent with the EIA Regulations. There is no requirement under the said Regulations for all residual effects to be compensated.
- 2.6.6 The below commitments provide an appropriate package of compensation and enhancement/furtherance measures to be delivered by the Project:
- e) Biodiversity Net Gain (BNG) - the Project is committed to delivering at least 10% BNG – further detail can be found within the **7.1 Biodiversity Net Gain Report [APP-299]** (Note: enhancement relates to the 10% net gain with wider environmental and societal benefits only)
 - f) The Applicant has also committed to a 3:1 replacement ratio for individual trees
 - g) Environmental measures contributing towards the natural beauty, special qualities, and key characteristics of Protected Landscapes – further detail can be found within **5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]**.

2.7 NPS Policy Framework – Applying the Planning Balance

- 2.7.1 The Project is in accordance with EN-1, EN-3 and EN-5 (January 2024) and is also in accordance with the newly adopted EN-1, EN-3 and EN-5 (January 2026). Paragraph 4.1.3 of EN-1 sets out a presumption in favour of granting consent for energy NSIPs. There is also a further presumption for CNP that *“the urgent need for CNP infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy”* as set out in paragraph 3.3.63 of EN-1.
- 2.7.2 The newly adopted EN-1 (2026) provides a further strengthening of the CNP case for development. Clean Power 2030 is first and foremost in the revised CNP policy

section with the opening paragraph now stating, *"Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure to meet the Clean Power 2030 Mission and net zero"*.

- 2.7.3 Given the specific circumstances of the Project being identified in the Clean Power 2030 report (NESO, 2024) as critical to delivering the Clean Power 2030 pathways, the Applicant considers significant weight and importance should be applied in the decision-making process, as suggested by the transitional arrangements of the new NPSs.
- 2.7.4 As explained in Section 1.5 above, paragraph 2.9.21 of EN-5 says that overhead line should be the strong starting presumption for electricity network developments in general. That strong starting presumption is reversed, but is only reversed for nationally designated landscapes. It is not displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea where their benefits clearly outweigh any extra economic, social or environmental impacts, applying the test set out in EN-5. The Applicant has applied the strong starting presumption of overhead lines in the correct places, and it has reversed that presumption in the circumstances of the National Landscape.
- 2.7.5 The Applicant has systematically applied the mitigation hierarchy in accordance with policy as summarised in Section 1.5 above.
- 2.7.6 None of the limited exceptions in Section 104(4)-(8) of the PA 2008 apply to the decision to be made by the Secretary of State in respect of the Application. In particular (in relation to Section 104(7)), the adverse impacts that should be afforded weight against the Project relate to loss of significance of and less than substantial harm to heritage assets, localised significant effects upon landscape and visual receptors, loss of BMV land and intra- and inter-project cumulative effects.
- 2.7.7 These impacts are significantly outweighed by the very substantial public interest benefits of the Project in meeting the need summarised in Section 1.3 above. The Project design has evolved through the application of the mitigation hierarchy as reported within the **5.6 Planning Statement [APP-085]**, the **6.1-6.18 Environmental Statement [APP-123-APP-287]** and the **5.15 Design Development Report [APP-122]**.
- 2.7.8 As identified in national policy and the Government's energy strategy there is an urgent and critical need to bring forward low carbon infrastructure to meet targets for decarbonisation and net zero. The Project will contribute to the delivery of these policy aims, by improving the existing electricity transmission network to accommodate the connection of proposed new power sources in East Anglia.
- 2.7.9 It is clear that there is a compelling case and established need for the Project and that it will deliver national economic, social and environmental benefits in line with the Government's clear objectives of delivering sustainable development.
- 2.7.10 The Project will also deliver other more localised socio-economic and environmental benefits. These include significant ecological enhancements including a commitment to provide 10% BNG, a 3:1 replacement tree planting ratio and also employment generation during construction.
- 2.7.11 The analysis of planning policy compliance demonstrates that the need for the Project is supported by national planning policy and other national energy and environmental policy, and that the Project addresses relevant national and local

planning policies through its design, avoiding sensitive areas and limiting adverse impacts where practicable.

- 2.7.12 In terms of the overall planning balance, the clear and substantial benefits of the Project clearly outweigh any adverse impacts. When assessing nationally significant low carbon infrastructure, the starting point is that the overarching need has been demonstrated by the Government, which should be given substantial weight as set out in paragraphs 3.2.6 to 3.2.8 in EN-1. It is considered that that the urgent need for the Proposed Development outweighs the negative impacts identified following the application of the mitigation hierarchy and therefore the general presumption in favour of grant at para 4.1.3 of EN-1 should apply. This presumption applies before consideration of the CNP further presumption.
- 2.7.13 The further presumption in favour of consent for CNP infrastructure as described at Paragraph 4.1.7 of EN-1 sets out that for CNP Infrastructure that “... *the need case will outweigh residual effects in all but the most exceptional circumstances*”.
- 2.7.14 The policies in paragraphs 4.2.16-4.2.17 of EN-1 (see paragraph 1.4.6 above) require the Secretary of State to take as a starting point for decision-making for CNP infrastructure as though it has met any test within the NPS (or any other planning policy) which requires outweighing of harm, including in highly protected spaces like the Green Belt, National Landscapes and SSSI areas.
- 2.7.15** On the basis that it is considered the Application should be approved in accordance with the general EN-1 policy framework (as set out above), it follows that applying the further CNP presumption contained in EN-1, the residual adverse effects do not outweigh the urgent need for the CNP infrastructure and that any tests set out in the NPS or other planning policy are to be treated as if they have been met.
- 2.7.16 The Applicant has demonstrated that the Project is in accordance with the relevant NPSs and the recently adopted 2026 NPSs and other national and local policy considered to be important and relevant and that substantial weight should be given to the critical and urgent national need for the Project when considering the application for development consent under the PA 2008. Given the above, there is a clear and compelling case for the Application to be approved and the National Grid (Norwich to Tilbury) DCO to be made.

3. Overarching Topics

3.1 Introduction

- 3.1.1 This chapter sets out the Applicant's comments on the matters raised in the Local Impact Reports that are not related to the topics in the Environmental Statement and planning policy topics that are covered in Chapter 4 of this document. The matters covered by this chapter are termed "overarching topics" in this document. This chapter predominately considers topics not specific to a geographical area, or locations that have been referred to by multiple Local Authorities or the Applicant recognises are a key concern of a single Local Authority. The headings for each section within this chapter align with the terminology used in the IAPI, to the extent that the scope of that section is found within the IAPI List of Issues. Other sections within this chapter are closer aligned to the Integral Issues listed in Annex C of the Rule 6 Letter.
- 3.1.2 The Applicant has been engaging with host Local Authorities since early project development in 2022. The matters and impacts covered in this chapter have generally also been covered in discussions with one or more host Local Authorities. The discussion of these matters is reported within relevant Statements of Common Ground and **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**. Each Local Authority Statement of Common Ground includes a Record of Key Engagement section, which contains a table listing the key engagement activities that have taken place between the Applicant and that Local Authority. Table 1.1 of this document provides Examination Library reference numbers for the Statements of Common Ground.
- 3.1.3 The Applicant is continuing to engage with host Local Authorities to progress any matters that remain under discussion, and will submit updated Statements of Common Ground at examination deadlines as requested by the ExA.

3.2 Needs Case and Timing

Local Authority Positions

- 3.2.1 All Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 3.1 Needs Case and Timing - Local Impact Report coverage

Local Authority	Paragraph(s) covering this topic
Norfolk County Council	4.1
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	1.7 part ii
Essex County Council	4.2.7 - 4.2.11
Thurrock Council	3.16
South Norfolk District Council	1.4.1
Tendring District Council	6.8 - 6.12
Colchester City Council	4.5 to 4.7
Braintree District Council	6.3.9 - 6.3.13
Chelmsford City Council	7.21 – 7.28
Brentwood Borough Council	7.10 - 7.11

The Applicant's Position

Introduction

- 3.2.2 All LIRs have raised questions or observations on the consideration of the Project's Needs Case and Timming, with most referring to an independent report, known as the Hiorns Report (The East Anglia Transmission Network Reinforcement Report by Hiorns Smart Energy Networks (2023)).
- 3.2.3 The Applicant's robust and quantified position on the Need Case and timing is set out below. The following seeks to address two distinct and clear areas, providing evidence of our consideration of policy and technical need for the Project. Alongside this we have explained the clear and urgent need for the timing of the Project. The areas addressed are grouped into two sections covering both the overarching themes and specific points raised by the LIRs:
- The need case is robust, quantified, independently validated and the licence obligation to deliver by 2030 is statutory, not merely contractual.
 - The Project is needed by 2030 — the Hiorns Report's 2035 conclusion is expressly rejected and including addressing why delay does not provide a deliverable HVDC alternative.

The need case is robust, quantified, independently validated and the licence obligation to deliver by 2030 is statutory, not merely contractual

- 3.2.4 Many of the LIRs question the robustness of the technical need and timing. The following section sets out the Technical Needs Case, that is why it is not possible for the existing system to be further enhanced and therefore provides the need for new circuit infrastructure. This section also addresses the timing and urgent need for this investment to meet the applicants obligations.
- 3.2.5 The Applicant's position is that the need case is not merely asserted in policy terms, but is grounded in quantified technical system deficits. Overarching National Policy Statement [NPS] for Energy (EN-1) identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible. Electricity infrastructure of the type proposed is critical national infrastructure, which is so urgent and important that we are told it will, in general, outweigh any other residual impacts and should be '*progressed as quickly as possible*' (NPS EN-1 paragraph 3.3.63 (2024)).
- 3.2.6 The timing and urgency for electricity infrastructure is referred to within NPS EN-1 (2024).
- '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).'*
- '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.'*
- 3.2.7 At each key stage of the consultation and submission process, in addition to the policy terms, the technical basis for the need case is reviewed and updated. The contracted background, as contained in both the National Energy System Operator (NESO) Transmission Entry Capacity Register³ and the NESO Electricity Ten Year Statement⁴, is reviewed. The most recent update was completed to capture the latest information as of June 2025, set out in Section 3: Need Case page 20-38 **7.17 Strategic Options Backcheck and Review [APP-355]**.
- 3.2.8 The need case in Section 3: Need case, Table 3.3, Page 31, of **7.17 Strategic Options Backcheck and Review [APP-355]** and replicated below, clearly states the existing system capabilities, highlighted by the purple box, and the amount of energy that is expected to transfer across system boundaries.

³ National Energy System Operator (NESO) (2026) *Transmission Entry Capacity Register*

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

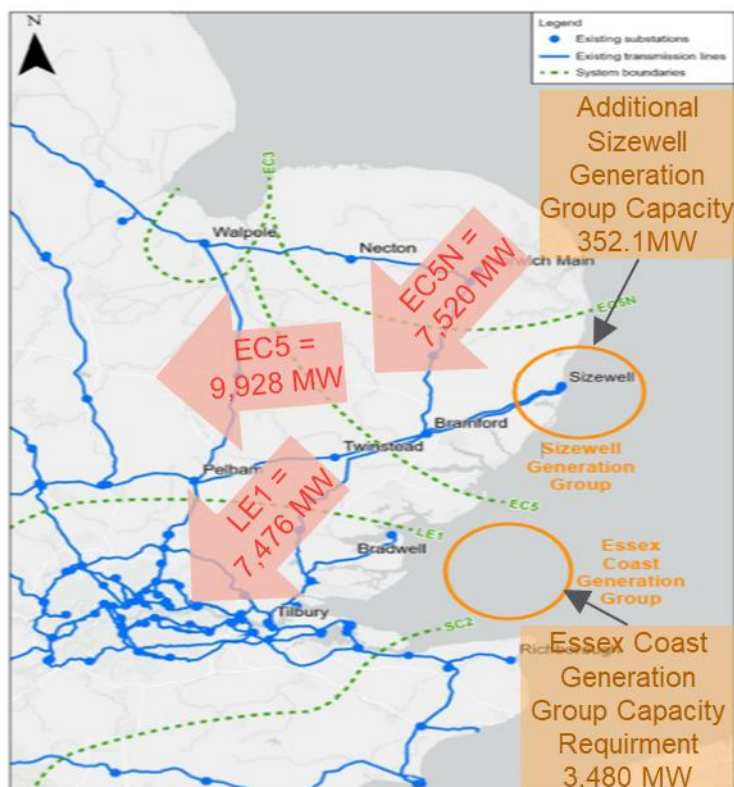
Image 3.1 East Anglia Planned Transfer requirements

	Planned Transfer	Post Fault Capability by 2031	Planned Transfer Boundary Deficit
EC5N (Maximum)	15,774.0 MW	6,652 MW	-9,122 MW
EC5 (Maximum)	24,834.7 MW	13,552 MW	-11,531 MW
EC5N (Minimum)	14,171.7 MW	6,652 MW	-7,520 MW
EC5 (Minimum)	23,232.4 MW	13,552 MW	-9,928 MW

- 3.2.9 There are limitations as to what a circuit can carry, defined by the International Electrotechnical Commission (IEC), which sets ratings for 420 kilovolt transmission, of 5,000 amperes, being the highest available equipment. This equates to:
- A capacity on a single circuit of 3,465 megavolt-ampere (MVA)
 - A double circuit of 6,930 MVA
 - Where there are four circuits remaining crossing a boundary after a fault, 13,860 MVA.
- 3.2.10 The current post-fault capacities of:
- EC5N – 2031 post fault capability 6,652 MVA, leaves a deficit of **-7,520 MW**
 - EC5 – 2031 post fault capability 13,552 MVA, leaves a deficit of **-9,928 MW**.
- 3.2.11 These circuits are operating within about 300 MW of the maximum capability, and therefore new infrastructure is required to meet the deficits.
- 3.2.12 Given the system indicated above is operating within 300 MW of maximum capability, a range of suggested network enhancement measures that have been considered and rejected, is set out in **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]**:
- LineVision Dynamic Line Rating (DLR) — enables real-time ambient conditions circuit ratings
 - TS Conductor — High Temperature Low Sag (HTLS) conductor
 - Super Conductors — low maturity transmission at level Liquid Nitrogen cooled conductors
 - Power Flow Control and Transmission Switching — moves power around the network to maximise utilisation
 - EC5 Constraint Management Intertrip — system to generator intertrips, only used during planned outages
 - Interconnector Operation — interconnectors between the UK and Europe are commercially independent systems. As the existing system is meeting the IEC 5000 Ampere (A), existing enhancement is not possible and new circuit infrastructure required.

- 3.2.13 The 'Essex Coast Generation Group' subsection in Section 3: Need Case page 34 of **7.17 Strategic Options Backcheck and Review [APP-355]** explains that the Applicant has also contracted connections for new generation and interconnectors located off the Essex Coast:
- Five Estuaries Offshore Windfarm (1,080 MW by 2030)
 - North Falls Offshore Windfarm (1,000 MW by 2030)
 - Tarchon Energy Limited Interconnector (1,400 MW By 2030).
- 3.2.14 This 3,480 MW of total generation requires connection in the region. The impact of these customers on the LE1 boundary is set out below:
- For the LE1 boundary:
- LE1 boundary has deficit of -4,620 MW, excluding the Essex Coast generation set out above.
- Including Essex Coast generation of 3,480 MW included, the LE1 boundary deficit rises to -7,476 MW.
- 3.2.15 Each of these issues supplement the technical need case, which lends weight to the policy need case in supporting the technical need for urgent reinforcement of the transmission system as soon as possible.
- 3.2.16 The image below shows the full needs case in diagram form as presented in Issue Specific Hearing 1 (ISH1) on the 13 February 2026.

Image 3.2 Needs case as presented in Issue Specific Hearing 1 (13 February 2026)



- 3.2.17 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.’*
- 3.2.18 The factors above show the 2025 updated need case continues to indicate the urgent need for reinforcement for both Contracted and ETYS requirements aligned with National Policy Statements and Transmission Licence Obligations.
- 3.2.19 NESO was created as a result of the Energy Act 2023 and is an independent System Operator, responsible for planning and delivering the energy of today and the future. To do this, NESO looks at all sources of energy (like gas and electricity) and works with customers, other organisations and government to deliver what is needed to reach a zero-carbon future. As part of its independent planning role NESO has published documents to identify projects to meet critical policy needs, the latest being the Clean Power 2030 report⁵.
- 3.2.20 NESO has continued to emphasise the independent need for the Project in the NESO Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis, Section 2.4: Securing Works for a 2030 delivery⁶ page 8, which states:
- ‘There are three key schemes originally signalled as being delivered in 2030 in the Pathway to 2030, but where delivery will now be in 2031. The impact of these schemes is shown below. The percentages shown represent the difference in modelled percentage clean power generation across a typical year across the pathways.*

⁵ National Energy System Operator (2024) *Clean Power 2030*

⁶ National Energy System Operator (NESO) (2024) *Clean Power 2030, Annex 2: Networks, Connections and network access analysis.*

Image 3.3 Impact of key projects for delivery in 2031 if not accelerated (Table from NESO Clean Power 2030 Report, Annex 2)

Project	Connections / Support	Impact on Clean Power / Constraint Impact		Latest Status from TOs
		Further Flex and Renewables	New Dispatch	
Norwich to Tilbury (AENC and ATNC)	Delivers new substation connecting • North Falls OWF • Five Estuaries OWF • Tarchon Interconnector Facilitates transfer of clean power through and out of East Anglia	-1.04% +£2.8 billion constraints in 2030	-1.0% clean power +£2.7 billion constraints in 2030	Planned for 2031
Sealink HVDC from Suffolk to Kent (SCD1)	Facilitates transfer of clean power through and out of East Anglia Required for connection of Five Estuaries OWF and firm connection of Rampion Extension	-0.6% +£1.4 billion constraints in 2030	-0.25% +£1.1 billion constraints in 2030	Planned for 2031

There is a significant capacity of offshore wind planned to connect this decade into East Anglia, which is a key enabler for clean power. Without the significant network capacity provided by these schemes a significant proportion of the wind power generated off East Anglia, around 23 TWh (in the Further Flex and Renewables pathway) will not be able to reach demand, leading to increased balancing costs and a need to replace some 4 TWh (in the same pathway) of this generation with unabated gas.'

- 3.2.21 The NESO Clean Power 2030 report identifies the Project as critical to delivering a network which supports the clean power pathways, Constraint costs arise when NESO has to manage this problem by paying generators to reduce (turn-down) their electricity output in areas that are congested and switch on (turn-up) in locations closer to electricity users. The specific reference to the Project in the Clean Power 2030 report provides additional recognition of the need for the Project to what is stated on the need for new electricity networks.

Further Policy Context

- 3.2.22 Section 4.2 of Overarching National Policy Statement for Energy (EN-1) (2024) sets out the urgent need for low carbon infrastructure. This section of policy recognises that ensuring the UK is more energy independent, resilient and secure requires a smooth transition to abundant, low carbon energy.
- 3.2.23 Paragraph 4.2.4 of NPS EN-1 confirms there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. The types of projects considered as low carbon infrastructure are defined at paragraph 4.2.5 and in the Section 6 Glossary of NPS EN-1.
- 3.2.24 Paragraph 3.3.63 states that (emphasis added): ***'Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly***

supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.'

- 3.2.25 Paragraph 3.3.65 goes on to state '*There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives*' and paragraph 3.3.66 notes that '*The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security. The delivery of this important infrastructure also needs to balance cost to consumers, accelerated timelines for delivery and the minimisation of community and environmental impacts*'.
- 3.2.26 Under the section on new electricity networks in NPS EN-1, paragraph 3.3.68 recognises that over the next decade the onshore and offshore transmission network will require '*... 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)*'.
- 3.2.27 Reflecting the level and urgency of need for energy infrastructure, paragraph 4.1.3 of NPS EN-1 states that the SoS should start with a presumption in favour of granting consent to applications for energy NSIPs. The presumption applies unless any more specific and relevant policies set out in relevant NPSs clearly indicate that consent should be refused, subject to the provisions of the PA 2008.
- 3.2.28 National policy is therefore clear that in general CNP infrastructure is urgent and there is a strong presumption in favour of development consent being granted for those projects. The Project team has applied the mitigation hierarchy to minimise residual impacts and the need for the Project strongly outweighs those impacts. In addition, the Project will help to meet the need for reinforcement in East Anglia, also mentioned in NPS EN-1 (paragraph 3.3.68).
- 3.2.29 Since the submission of the application, the suite of energy NPSs has been updated. The transition provisions set out in Section 1.6 of NPS EN-1 (2026) apply to the application as it was accepted prior to the publication of the revised policy. The updated NPSs are capable of being important and relevant considerations in the decision-making process. The 2026 EN-1 and EN-5 now set out the government's commitment to the Clean Power Action Plan 2030⁷, which aims for at least 95% of the UK's electricity generation to come from clean sources by 2030 and emphasises the urgency and CNP of developing low-carbon infrastructure, thereby supporting the need case established in the ES.
- 3.2.30 **Conclusion:** National Policy Statement (NPS) EN-1 identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible. Therefore, the timing and need for the Project set out Section 3 Needs Case pages 20-38 **7.17 Strategic Options Backcheck and Review [APP-355]** remains urgent within the requirements of NPS EN-1 and EN-5, alongside the Electricity Act 1989 and Transmission Owner Licence requirements recognised within the National Policy Statements and the Applicant's obligations.

⁷ UK Government (2024) [Clean Power 2030: Action Plan: A new era of clean electricity](#)

- 3.2.31 The statutory framework — Electricity Act 1989, Applicants Transmission Owner Licence Condition D2 (Appendix A page A3 paragraph A.3.3 of **7.17 Strategic Options Backcheck and Review [APP-355]**), NPS EN-1 paragraph 3.3.83, and NPS EN-5 paragraph 2.8.5 — demonstrates that the 2030 delivery obligation is multi-layered and not reducible to NGET's own commercial choices. The IEC 5,000 A ceiling and the rejection of all enhancement measures provide the technical underpinning. This material directly addresses and rebuts several LIRs' characterisation of 2030 as a mere ambition or self-imposed commercial target.

The Project is needed by 2030 — the Hiorns Report's 2035 conclusion is expressly rejected and including addressing why delay does not provide a deliverable HVDC alternative

- 3.2.32 Most of the LIRs refer to the Hiorns Smart Energy report either directly in the LIR or with reference to written representations. This section seeks to respond thoroughly to the issues raised within the LIRs.
- 3.2.33 The Applicant responded to the Hiorns smart energy report in April 2024, saying that it does not agree with the report's conclusions that a delay to 2035 would be possible. The requirement for energy security independence and net zero are to be achieved as soon as possible.
- 3.2.34 As set out above the Independent NESO Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis⁸, Section 2.4: Securing Works for a 2030 delivery, states that the requirements indicate that the Project should be delivered sooner than 2031 if possible, and that a delay would have significant consequences to consumers, of constraint costs, and would impact the Applicant's obligations under the planning requirements and its transmission licence.
- 3.2.35 Paragraph 2.8.5 of NPS EN-5 makes it clear that the Applicant, as a transmission company, is required to facilitate generation, and this is reflected in its transmission licence obligation D2, an obligation to provide transmission services when requested. The delay to any investment would incur the cost of £2.7 billion, as set out in Annex 2 of the NES Clean Power 2030 report.
- 3.2.36 The Applicant also notes constraints in the HVDC market, which are likely to make a HVDC alternative a deliverability risk even if there was a delay of five years. Where the Applicant is currently delivering HVDC projects, it is delivering 2 GW solutions. Norwich to Tilbury would require a 6 GW solution. Not only would there be constraints in delivering the cables, but also in the converter market and the specialist requirements that are needed as part of a HVDC installation, including access to cable-laying ships and equipment to do it. These are under extreme worldwide pressure with a number of companies seeking to use the limited HVDC resources that are available.
- 3.2.37 The availability of HVDC circuit breakers is another technical limitation at the current time. This especially restricts the amount of generation directly connecting to an individual HVDC network to 1,800 MW because, without the circuit breakers, the whole network would be lost. This would result in widescale transmission system problems and would be a breach of the National Electricity Transmission System Security and Quality of Supply Standards (NETS SQSS), which is a requirement in

⁸ National Energy System Operator (2024) *Clean Power 2030 Annex 2: Networks, connections and network access analysis*.

the Applicant's licence, Condition D3: Transmission system security standard and quality of service.

- 3.2.38 The 1,800 MW HVDC infeed ceiling should be measured against the 3,480 MW already contracted from the Essex Coast alone — a figure more than double the technical limit. This makes the deliverability of an offshore/HVDC alternative even more acute than is apparent from the general argument.
- 3.2.39 The NPS EN-1 offshore coordination argument is also directly addressed. NPS EN-1 states:
- '3.3.81 The importance of accelerating coordination does not, however, militate against the need for standalone electricity networks projects, and these projects are supported by this NPS and should continue to be assessed on their own merits.'*
- 3.2.40 The cost differential between the proposed Project and all HVDC alternatives is stark, and is set out from the transparent economic appraisal in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**. The following costs were set out at the hearing with all data from **[APP-357]** and all cost information defined by the fully transparent cost model for circuit alternatives, in its Appendix D — Economic Appraisal:
- Wholly Overhead Line — Project Total: £894.50m
 - Wholly 4-Ended HVDC Option Project Total: £5,854.50m
 - Offshore 1 — Sub-optimal 2-Ended HVDC Option Norwich to Tilbury: £4,096.50m
 - Offshore 1 — 3-Ended HVDC Option Norwich to Bramford to Tilbury: £5,361.10m.
- 3.2.41 The additional cost of making the offshore option technically comparable is also quantified. Paragraph 14.4.6, page 111 of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** states: *'Should this circuit at full 6000 MW capacity [be] made multiterminal to provide the same system flexibility as the AC circuit options [there] would be a need for an additional three sets of HVDC convertor stations and three sets of 50km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital costs of £5,361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m).'*
- 3.2.42 There is no evidence that the cost differential between these alternatives will improve over time. In fact, due to the materials, manufacturing and technical requirements of alternatives, alongside the market constraints set out above, the gap between technologies is currently likely to increase rather than decrease.
- 3.2.43 Furthermore, **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]** notes that the offshore option in its basic configuration cannot achieve the full need case: *'The reason it is suboptimal is because it does not have the connection with Bramford Substation or the EACN, and therefore would not facilitate the connection of generation customers or give the same transmission capabilities as are provided in the proposed connection.'*

- 3.2.44 The real-world consequences of that delay in terms of energy generation are made explicit in the independent NESO Clean Power 2030 Report, Annex 2⁹, *‘There is a significant capacity of offshore wind planned to connect this decade into East Anglia, which is a key enabler for clean power. Without the significant network capacity provided by these schemes a significant proportion of the wind power generated off East Anglia, around 23 TWh (in the Further Flex and Renewables pathway) will not be able to reach demand, leading to increased balancing costs and a need to replace some 4 TWh (in the same pathway) of this generation with unabated gas’*.
- 3.2.45 On the independence of the constraint cost analysis, **8.5.3 Applicant’s Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]** is explicit: NESO is the owner of the Least Worst Regrets Analysis and the owner of the model and data that produce the output balancing Project costs against constraint costs. The NESO evaluations are reflected in Section 4 Identification of Strategic Options, page 39-44 **7.17 Strategic Options Backcheck and Review [APP-355]** and NESO Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis, Section 2.4: Securing Works for a 2030 delivery page, which represents the latest impact upon constraints.
- 3.2.46 **Conclusion: 8.5.3 Applicant’s Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]** directly, specifically, and in quantified terms responds to every element of the Hiorns-based LIR challenge. The NESO Clean Power 2030 Annex 2 constitutes the independent evidence that some LIRs assert is missing — it is not National Grid’s own evidence but NESO’s own model and data. The £2.7–2.8 billion constraint cost figure (equivalent to £7m per day) and the 23 TWh wind power loss figure are particularly powerful. The finding that HVDC market constraints mean delay would not produce a deliverable alternative directly addresses several LIR positions, that a delay would open the door to offshore alternatives
- 3.2.47 **8.5.3 Applicant’s Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]** provides a comprehensive response to the offshore/HVDC alternative case advanced by ECC, SCC, and Brentwood. The HVDC circuit breaker constraint alone, limiting generation infeed to 1,800 MW against 3,480 MW of contracted Essex Coast generation, demonstrates that an offshore alternative cannot deliver the full need case regardless of any delay in the Project timetable. The cost differential of approximately £4.5 billion against the proposed Project provides a further powerful independent response.

⁹ National Energy System Operator (2024) *Clean Power 2030 Annex 2: Networks, connections and network access analysis*.

3.3 Alternatives - Offshore Alternatives

Local Authority Positions

- 3.3.1 All Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 3.2 Alternatives – Offshore Alternatives - Local Impact Report coverage

Local Authority	Paragraph(s) covering this topic
Norfolk County Council	4.1
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	1.7 part ii
Essex County Council	4.2.1
Thurrock Council	3.16
South Norfolk District Council	1.4.1
Tendring District Council	6.5 – 6.8
Colchester City Council	3.3 to 3.7
Braintree District Council	6.3.7 – 6.3.13
Chelmsford City Council	6.5 , 7.17 – 7.28
Brentwood Borough Council	7.1 - 7.5

The Applicant's Position

Introduction

- 3.3.2 All LIRs have raised have set out that consideration of alternatives, especially offshore solutions should be considered in further detail.
- 3.3.3 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 page 25 and 26, set out the relevant context for onshore schemes, which starts from the Government's strong starting presumption in National Policy Statement (NPS) for Electricity Networks Infrastructure (EN-5)¹⁰ 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.
- 3.3.4 The Project has been developed to be consistent with NPS EN-5 (2024) which is clear that the use of overhead lines is the strong starting presumption for electricity networks development. At each stage of the Project a consistent level of information has been used to support decision making between alternatives, leading to the

¹⁰ Department for Energy Security and Net Zero (2024) *National Policy Statement for Electricity Networks Infrastructure (EN-5)*

selection of the preferred option. There is no requirement for all design variants or alternatives to be studied to the same level of detail captured within the Preliminary Environmental Information Report or Environmental Statement supported by a similar degree of detail from associated surveys. The Applicant does not consider it proportionate to complete such an extent of surveys, nor reasonable to impose such surveys on landowners when there can be shown, based on available data, to be no realistic prospect of an option progressing.

3.3.5 The Applicant's position is set out below. The following sections address three distinct and clear areas, providing evidence of our robust consideration of alternatives that meet both the policy and technical need for the Project, alongside the clear and urgent need for the timing of the proposal. The areas to be addressed are as follows:

- It is not possible to enhance existing system capability due to existing system circuit capacity limitations
- Robust multi-factor consideration of alternative options and option selection
- Independent NESO constraint assessment and NESO Least Worst Regrets Analysis.

It is not possible to enhance existing system capability due to existing system circuit capacity limitations

3.3.6 To address the concerns referenced in the LIR with regard to written representations it is important in the first instance to set out the requirement for new transmission infrastructure and why enhancement of the existing system is not possible.

3.3.7 At each key stage of the consultation and submission process, in addition to the policy terms, the technical basis for the need case is reviewed and updated. Both the contracted background, as contained in the National Energy System Operator (NESO) Transmission Entry Capacity Register¹¹ and the NESO Electricity Ten Year Statement¹² is reviewed. The most recent update was completed to capture the latest information as of June 2025 as set out in the **7.17 Strategic Options Backcheck and Review [APP-355]** Section 3 Need Case pages 20-38.

3.3.8 The need case in Section 3: Need case, Table 3.3, Page 31 of **7.17 Strategic Options Backcheck and Review [APP355]** and replicated below, clearly states the existing system capabilities, highlighted by the purple box, and the amount of energy that is expected to transfer across system boundaries.

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¹² National Energy System Operator (2024) *Electricity Ten Year Statement*

Image 3.4 East Anglia Planned Transfer Requirements

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- 3.3.9 There are limitations as to what a circuit can carry, defined by the International Electrotechnical Commission (IEC), which set ratings for 420 kilovolt (kV) transmission, of 5,000 amperes being the highest available equipment. This equates to:
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- 3.3.11 These circuits are operating within about 300 MW of the maximum capability, and therefore new infrastructure is required to meet the deficits.
- 3.3.12 Given the system indicated above is operating within 300MW of maximum capability, a range of suggested network enhancement measures that have been considered and rejected is set out in **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]**:
- LineVision Dynamic Line Rating (DLR) — enables real-time ambient conditions circuit ratings
 - TS Conductor — High Temperature Low Sag (HTLS) conductor
 - Super Conductors — low maturity transmission at level liquid nitrogen cooled conductors
 - Power Flow Control and Transmission Switching — moves power around the network to maximise utilisation
 - EC5 Constraint Management Intertrip — system to generator intertrips, only used during planned outages
 - Interconnector Operation — interconnectors between the UK and Europe are commercially independent systems. As the existing system is meeting the IEC 5000 Ampere (A), existing enhancement is not possible and new circuit infrastructure required.

- 3.3.13 **Conclusion:** The existing system is operating within 300 MW of its maximum capability as determined by Existing System Maximum IEC 5000 Ampere maximum current rating. There is no possible way to enhance the existing system beyond this limitation, therefore, stakeholder-proposed system enhancements are not viable options as set out above, and would not address technical need or the policy need for the Project. The only solution to address the deficits set out above is new circuit infrastructure as set out in the Applicant's proposal.
- 3.3.14 Overarching National Policy Statement (NPS) EN-1¹³ identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible. Therefore, the timing and need for the Project set out **7.17 Strategic Options Backcheck and Review [APP-355]** Section 3 Need Case, pages 20-38, remains urgent within the requirements of the NPS EN-1 and EN-5 framework, alongside the Electricity Act 1989 and Transmission Owner Licence requirements recognised within the National Policy Statements and the Applicant's obligations.
- 3.3.15 The statutory framework (Electricity Act 1989, Transmission Owner Licence Condition D2 (as described in Appendix A, paragraph A.3.3, Page A2 **[APP-355]**), NPS EN-1 paragraph 3.3.83, and NPS EN-5 paragraph 2.8.5) demonstrates that the 2030 delivery obligation is multi-layered and not reducible to NGET's own commercial choices. The IEC 5,000 A ceiling and the rejection of all enhancement measures provide the technical underpinning. This material directly addresses and rebuts the Suffolk County Council and Essex County Council characterisation of 2030 as a mere ambition or self-imposed commercial target.

Robust Multi-Factor Consideration of Alternative Options and Option Selection

- 3.3.16 A number of LIRs noted that a preference for an offshore alternative and set out that the consideration of alternatives had not adequately assessed the cost or the multifactor impacts of alternatives. This section addresses these points.
- 3.3.17 The multi-factor evaluation of all alternative options confirms the same conclusion. **7.19 2023 — Strategic Options Backcheck and Review [APP-357]** Section 5 Options assessment process, pages 47-49, sets out how the Applicant evaluated the options, taking into account the environmental assessment, socioeconomic aspects, technical benefits and the capital lifetime costs. This concluded that the need case was met by the onshore AC solution, in line with NPS EN-1 and the Electricity Act 1989. It also integrates new customer connections within the Norwich to Tilbury Project, in line with the transmission and licence obligations.
- 3.3.18 The Applicant has considered a whole range of different alternatives on the Project, some more theoretical and conceptual, as reported in **7.17 Strategic Options Backcheck and Review [APP-355]** Chapter 5 Strategic Option Overview pages 45-47 summarises the options, **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**, entire chapter and **5.15 Design Development Report [APP-122]** Section 2 Project-Wide Consideration Relevant to Design Development pages 17-33 and local issues addressed in section A-H sitting and routing alternatives. More localised design variants have also been considered.

¹³ Department for Energy Security and Net Zero (2024) *National Policy Statement for Electricity Networks Infrastructure (EN-5)*

- 3.3.19 The Applicant considered the following options, as well as alternating current (AC) overhead lines:
- An AC gas insulated line: this uses a tube with an insulator in it and gas surrounding it as the insulation material. No AC gas insulated line has been constructed anywhere in the world above 10 km in length. It is not a technology that has reached sufficient maturity at transmission level for this proposal.
 - AC underground cables: these require a Cable Sealing End (CSE) compound or substation every 20-30 km to have a set of reactors and switching stations to manage technical limitations in the way that cables work and to avoid a collapse of energy within the cable. Therefore, an AC underground cable has to come above the ground at intervals and reactors are needed.
 - High voltage direct current (HVDC) cable: this requires a converter station at each end of the cable. The largest converter stations with cables that are being used currently are 2 GW at 520 kV, so to achieve the 6 GW needed on Norwich to Tilbury, three sets of these HVDC systems would be required, with a minimum of three converters at each end of the connection.
- 3.3.20 Appendix D: Economic Appraisal of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** pages D1-D14, presents the costs, based on a transparent economic appraisal.
- 3.3.21 The costs were set out at the hearing with all data coming from **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, Sections 7 -14, tables of each section and all cost information defined by the fully transparent cost model for circuit alternatives in its Appendix D: Economic Appraisal.

Image 3.5 Alternative Methods of Electricity Transmission – Cost Overview

Data +B21:N39from 7.19 2023 - Strategic Options Backcheck and Review [APP-357] Cost base in 2020/21 prices				
On-shore	Wholly Overhead Line - Project Total EAN4 (AENC) + EAS2 (ATNC)	EAN4 (AENC) OHL	EAS2 (ATNC) OHL	TOTAL
	Data from Table 10.1 page 80 + Data from Table 12.1 page 93	£355.20m	£539.30m	£894.50m
	Majority Overhead Line - Project Total EAN4 (AENC) + EAS2 (ATNC) [with 20km Cable]	EAN4 (AENC) OHL	EAS2 (ATNC) OHL + Cable	TOTAL
	Derived by 7.19 2023 - Strategic Options Backcheck and Review [APP-357] Appendix D "Economic Appraisal"	£355.20m	£1,275.10m	£1,630.30m
	Wholly 4 Ended HVDC Option Project Total EAN4 (AENC) + EAS2 (ATNC)	EAN4 (AENC) HVDC	EAS2 (ATNC) HVDC	TOTAL
	Data from Table 10.1 page 80 + Data from Table 12.1 page 93	£2,381.50m	£3,473.00m	£5,854.50m
Off-shore	Offshore 1 - Sub-optimal 2 Ended HVDC Option Norwich to Tilbury	Offshore 1		TOTAL
	Data from Table 14.2 page 110	£4,096.50m		£4,096.50m
	Offshore 1 - 3 Ended HVDC Option Norwich to Bramford to Tilbury	Offshore 1	Bramford HVDC Turn-in Cost	TOTAL
	Data from paragraph 14.4.6 page 111	£4,096.50m	£1,265.10m	£5,361.60m
*	Transmission System Comparable Options - Delivering System Benefits of Connecting to Bramford			

- 3.3.22 The table sets out all of the figures shown in **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]** and the location of the data from **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**. All costs are in 2020/21 cost base. The Wholly Overhead Line cost £894.5m (the pre-consultation cost considering the whole option provided by overhead line). The Majority Overhead Line option included the consultation sections of underground cable which mitigate the impact on the Nationally Designated Landscape as required by NPS EN-5. These sections of cable, which form part of the EAS2 (ATNC) Bramford to Tilbury section, total circa 20 km and are the nearest proxy for the Project at £1,630.3m.
- 3.3.23 Paragraph 14.4.6 referenced in the table above, states:
- ‘14.4.6 Should this circuit at full 6000 MW capacity made multiterminal to provide the same system flexibility as the AC circuit options. There would be a need for an additional three sets of HVDC convertor stations and three sets of 50km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital costs of £ 5361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m).’
- 3.3.24 The cost of a wholly overhead line, without any regard to any landscapes or any other environment constraints is presented as part of the initial appraisal. There is also a second cost, which includes the post-consultation view of the requirements to mitigate the landscape impacts, i.e., the cost with the underground cable of £1.6 billion. In comparison, the cost of a wholly four-ended HVDC option is £5.8 billion.
- 3.3.25 The Offshore 1 - suboptimal 2-ended HVDC option between Norwich and Tilbury would cost £4 billion. The reason it is suboptimal is because it does not have the connection with Bramford Substation and therefore would not facilitate the connection of generation customers or give the same transmission capabilities as are provided in the proposed connection.
- 3.3.26 To achieve the proposed same electrical capabilities, there is an option to have a three-ended link in Bramford Substation, so there would be three converters at Norwich, three converters at Tilbury, and three converters at Bramford Substation on a three-ended HVDC Voltage Source Converter (VSC) link. This would bring it to a similar technical capability as the proposed connection but would raise the price to £5.3 billion. It would also have no ability to connect the generation customers.
- 3.3.27 The Applicant also notes constraints in the HVDC market, which are likely to make a HVDC alternative a deliverability risk even if there was a delay of five years. Where the Applicant is currently delivering HVDC projects, it is delivering 2 GW solutions. Norwich to Tilbury would require a 6 GW solution. Not only would there be constraints in delivering the cables, but also in the converter market and the specialist requirements that are needed as part of a HVDC installation, including access to cable-laying ships and equipment to do it. These are under extreme worldwide pressure with a number of companies seeking to use the limited HVDC resources that are available.
- 3.3.28 The availability of HVDC circuit breakers is another technical limitation at the current time. This restricts any generation connecting to a HVDC network to 1,800 MW because, without the circuit breakers, the whole network would be lost. This would result in widescale transmission system problems and would be a breach of the

National Electricity Transmission System Security and Quality of Supply Standards, which is a requirement in the Applicant's licence, Condition D3: Transmission system security standard and quality of service.

- 3.3.29 The 'Essex Coast Generation Group' subsection in Section 3: Need case, pages 40-41, of **7.17 Strategic Options Backcheck and Review [APP-355]** explains that the Applicant has also contracted connections for new generation and interconnectors located off the Essex Coast:
- Five Estuaries Offshore Windfarm (1,080 MW by 2030)
 - North Falls Offshore Windfarm (1,000 MW by 2030)
 - Tarchon Energy Limited Interconnector (1,400 MW By 2030).
- 3.3.30 This 3,480 MW of total generation requires connection in the region.
- 3.3.31 The 1,800 MW HVDC infeed ceiling should be measured against the 3,480 MW already contracted from the Essex Coast alone — a figure more than double the technical limit. This makes the deliverability of an offshore/HVDC alternative even more acute than is apparent from the general argument.
- 3.3.32 The NPS EN-1 (2024) offshore coordination argument is also directly addressed. NPS EN-1 also states:
- '3.3.81 The importance of accelerating coordination does not, however, militate against the need for standalone electricity networks projects, and these projects are supported by this NPS and should continue to be assessed on their own merits.'
- 3.3.33 Table 15.4, page 122 in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** showed a summary of the options that in combination could meet the need. An updated version of the table is attached to show how the Majority Overhead Line information has been calculated utilising Appendix D: Economic Appraisal pages D1 -D14 I of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** to provide full transparency of the numbers provided in the hearing.

Image 3.6 Cost Table from [APP-357] with Post Consultation Cable Assessment

7.19 2023 Strategic Options Backcheck and Review [APP-357] includes Table 15.4 page 122 in 2020/21 Cost Base								
Boundary or Group	2020/21 Onshore Options				Offshore			
EC5N	EAN 1 Necton to Pelham	EAN 2 Necton to Twinstead	EAN 3 Necton to Bramford	EAN 4 Norwich Main to Bramford	Offshore 1 Norwich Main to Tilbury	2020/21 Cost Base Post Consultation inclusion of OHL and AC Cable section of 20kms added to EAS 2		
Economic Technology (Capacity)	OHL 115km (6930 MW)	OHL 90km (6930 MW)	OHL 85km (6930 MW)	OHL 80km (6930 MW)				
Capital Cost including non-circuit works	£494.5m	£494.2m	£375.1m	£355.2m				
Circuit 40yr Lifetime NPV Cost	£787m	£616m	£582m	£548m				
EC5 & LE1	EAS 1* Twinstead to Tilbury	EAS 2 Bramford via new substation to Tilbury	EAS 3 Bramford via Bradwell to Tilbury			EAS 2 Cable Section (after detailed appraisal and consultation outside SOR assessment) Bramford via new substation to Tilbury		
Economic Technology (Capacity)	OHL 80km (6930 MW)	OHL 100km (6930 MW)	OHL 130km (6930 MW)	HVDC 220km (6000 MW) [4000 MW]		OHL 80km	Cable 20km	Total 100km
Capital Cost including non-circuit works	£454.4m	£539.3m	£658.7m	£4,096.5m [£2,882.4m]		£459.7m	£815.4m	£1,275.1m
Circuit 40yr Lifetime NPV Cost	£548m	£684m	£890m	£4,661m [£3,232m]		£547m	£845m	£1,392m
SC2, EC5 & Sizewell	Sea Link Sizewell area to Richborough area							
Economic Technology (Capacity)	HVDC 145km 2000 MW							
Capital Cost including non-circuit works	£1,420.8m							
Circuit 40yr Lifetime NPV Cost	£1,197m							

3.3.34 The cost differential between the proposed Project and all HVDC alternatives is stark, and is set out from the transparent economic appraisal in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**. The following costs were set out in **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]**, with all data from [APP-357] and all cost information defined by the fully transparent cost model for circuit alternatives in its Appendix D - Economic Appraisal:

- Wholly Overhead Line — Project Total: £894.50m
- Wholly 4-Ended HVDC Option Project Total: £5,854.50m
- Offshore 1 — Sub-optimal 2-Ended HVDC Option Norwich to Tilbury: £4,096.50m
- Offshore 1 — 3-Ended HVDC Option Norwich to Bramford to Tilbury: £5,361.10m.

- 3.3.35 The additional cost of making the offshore option technically comparable is also quantified. Paragraph 14.4.6, page 111 of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** states: *'Should this circuit at full 6,000 MW capacity be made multi-terminal to provide the same system flexibility as the AC circuit options, there would be a need for an additional three sets of HVDC converter stations and three sets of 50km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital costs of £5,361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m).'*
- 3.3.36 There is no evidence that the cost differential between these alternatives will improve over time. In fact, due to the materials, manufacturing and technical requirements of alternatives, alongside the market constraints set out above, the gap between technologies is currently likely to increase rather than decrease.
- 3.3.37 Furthermore, **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]** notes that the offshore option in its basic configuration cannot achieve the full need case: *'The reason it is suboptimal is because it does not have the connection with Bramford Substation, and therefore would not facilitate the connection of generation customers or give the same transmission capabilities as are provided in the proposed connection.'*
- 3.3.38 The real-world consequences of that delay in terms of energy generation are made explicit in the independent NESO Clean Power 2030 Report, Annex 2, *'There is a significant capacity of offshore wind planned to connect this decade into East Anglia, which is a key enabler for clean power. Without the significant network capacity provided by these schemes a significant proportion of the wind power generated off East Anglia, around 23 TWh (in the Further Flex and Renewables pathway) will not be able to reach demand, leading to increased balancing costs and a need to replace some 4 TWh (in the same pathway) of this generation with unabated gas'*.
- 3.3.39 **Conclusion:** The Applicant explored a number of Onshore and Offshore alternatives, considering technologies including AC Overhead Lines, AC Gas Insulated Lines, AC Cables and High Voltage Direct Current (HVDC) solutions.
- 3.3.40 Documents **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** and **7.17 Strategic Options Backcheck and Review [APP-355]** have set out these alternatives and how the Applicant evaluated the options, taking into account the environmental assessment, socioeconomic aspects, technical benefits and the capital lifetime costs. The cost element of the evaluation is supported by a transparent cost model in Appendix D: Economic Appraisal, pages D1-D14, of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**.
- 3.3.41 This concluded that the need case was met by the onshore AC solution, in line with NPS EN-1 and the Electricity Act 1989. It also integrates new customer connections within the Norwich to Tilbury Project, in line with the transmission and licence obligations. The conclusion remains that the nearest proxy for the Project at £1,630.3m remains best way to deliver the Project, with the urgent requirements set out in NPS EN-1 and EN-5, alongside the Electricity Act 1989 and Transmission Owner Licence requirements recognised within the National Policy Statements and applicants' obligations.

- 3.3.42 **8.5.3 Applicant’s Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]** provides a comprehensive response to the offshore/HVDC alternative case advanced by several authorities such as ECC, SCC, and Brentwood. The HVDC circuit breaker constraint alone — limiting generation infeed to 1,800 MW against 3,480 MW of contracted Essex Coast generation — demonstrates that an offshore alternative cannot deliver the full need case regardless of any delay in the Project timetable. The cost differential of approximately £4.5 billion against the proposed Project provides a further powerful independent response.

Independent NESO Constraint Assessment and NESO Least Worst Regrets Analysis

- 3.3.43 LIRs referring to Written Representations particular highlighted in Tendring District LIR paragraph 6.5 “TDC questions NGET’s cost-benefit analysis”. This section seeks to add additional context to the cost’s derived by the applicant and Least Worst Regrets (LWR) and further analysis undertaken by the independent National Energy System Operator (NESO), setting out option recommendations and consequences of delayed delivery.
- 3.3.44 The National Energy System Operator (NESO) was created as a result of the Energy Act 2023, and is an independent System Operator. It is responsible for planning and delivering the energy of today and the future. To do this, NESO looks at all sources of energy (like gas and electricity) and works with customers, other organisations and government, to deliver what is needed to reach a zero-carbon future. NESO as part of its independent planning role has published documents to identify projects to meet critical policy needs. In 2022 NESO (previously the Electricity System Operator (ESO)) produced the Network Options Assessment (NOA)¹⁴.
- 3.3.45 Section 4.3: NOA Cost Benefits Analysis, pages 44-46, of **7.17 Strategic Options Backcheck and Review [APP-355]** describes the original Least Worst Regrets Analysis carried out by the Electricity System Operator (ESO) (now referred to as the National Energy System Operator (NESO)). This exercise was only undertaken once by NESO and reflected within our report, and is not the Applicant’s options evaluation process. NESO is a fully independent organisation and undertakes Least Worst Regrets Analysis as part of establishing proceed signals for projects. The NOA cost-benefit analysis identified the ‘East 7’ option as the highest ranking option from an economic perspective. This option is shown in Table 4.2, page 46 of **7.17 Strategic Options Backcheck and Review [APP-355]**, which is reproduced below.

¹⁴ Electricity System Operator (2022) *Network Options Assessment*

Image 3.7 East 7 outcome recommendation from [APP-355]

East 7 Capex £2,189.75m As East 6 with enhanced export capacity from EC5	AENC	Norwich-Bramford	AC OHL (Onshore)
	ATNC	Bramford-Tilbury	AC OHL (Onshore)
	SCD1	Richborough-Sizewell	HVDC Cable (Offshore)
	TENC	Tilbury-Grain	AC OHL (Onshore)

3.3.46 In November 2024 NESO published the Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis, Section 2.4: Securing Works for a 2030 delivery¹⁵, page 8, published 5 November 2024 which states:

‘There are three key schemes originally signalled as being delivered in 2030 in the Pathway to 2030, but where delivery will now be in 2031. The impact of these schemes is shown below. The percentages shown represent the difference in modelled percentage clean power generation across a typical year across the pathways.

Image 3.8 NESO Clean Power 2030, Annex 2: Networks, Connections and network access analysis

Project	Connections / Support	Impact on Clean Power / Constraint Impact		Latest Status from TOs
		Further Flex and Renewables	New Dispatch	
Norwich to Tilbury (AENC and ATNC)	Delivers new substation connecting • North Falls OWF • Five Estuaries OWF • Tarchon Interconnector Facilitates transfer of clean power through and out of East Anglia	-1.04% +£2.8 billion constraints in 2030	-1.0% clean power +£2.7 billion constraints in 2030	Planned for 2031
Sealink HVDC from Suffolk to Kent (SCD1)	Facilitates transfer of clean power through and out of East Anglia Required for connection of Five Estuaries OWF and firm connection of Rampion Extension	-0.6% +£1.4 billion constraints in 2030	-0.25% +£1.1 billion constraints in 2030	Planned for 2031

There is a significant capacity of offshore wind planned to connect this decade into East Anglia, which is a key enabler for clean power. Without the significant network capacity provided by these schemes a significant proportion of the wind power generated off East Anglia, around 23 TWh (in the Further Flex and Renewables pathway) will not be able to reach demand, leading to increased balancing costs and a need to replace some 4 TWh (in the same pathway) of this generation with unabated gas.’

¹⁵ National Energy System Operator (NESO) (2024) Clean Power 2030, Annex 2: Networks, Connections and network access analysis.

- 3.3.47 **Conclusion:** The independent NESO is the owner of the Least Worst Regrets Analysis, they are the owner of the analysis model and data. They apply their model to balance Project Costs and Constraint Costs to evaluate impacts upon the consumer.
- 3.3.48 The NESO evaluations are reflected in **7.17 Strategic Options Backcheck and Review [APP-355]**, pages 44-46 and Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis, Section 2.4: Securing Works for a 2030 delivery, page 8. The NESO published information within these documents and set out above represents the latest impact upon system constraints and associated costs. These robust and independent assessments and reports support the urgent Need for the Transmission System reinforcement as set out in NPS EN-1. They independently support both the technical and policy need for transmission infrastructure, preferably by 2030, in the interest of electricity consumers and reduction in constraint costs for the system.

3.4 Alternatives - Technology Choice – Overhead Line and Underground Cables

Local Authority Positions

- 3.4.1 Eight Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 3.3 Alternatives - Technology Choice - Local Impact Report coverage

Local Authority	Paragraph(s) covering this topic
Norfolk County Council	11.24 - 11.25, 11.271.28
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	1.7, 4.7
Essex County Council	4.2.1 - 4.2.6, 4.3.7 - 4.3.10
Thurrock Council	N/A
South Norfolk District Council	N/A
Tendring District Council	2.7, 6.7 - 6.8, 6.11 - 6.12
Colchester City Council	3.1, 12.79, 12.121 - 12.123, 12.252 - 12.253
Braintree District Council	6.4.1
Chelmsford City Council	6.5, 7.28, 8.54 - 8.55
Brentwood Borough Council	7.5 - 7.7

The Applicant's Position

Introduction

- 3.4.2 The Applicant's position is that its proposals are the appropriate means to meet the need case in the context of policy and regulatory environments. The Applicant has

considered a whole range of different technology alternatives for the Project, as reported in **7.17 Strategic Options Backcheck and Review [APP-355]**, **7.18 2022 – Corridor and Preliminary Routing and Siting Study [APP-356]**, **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** and **5.15 Design Development Report [APP-122]**. More localised design variants have also been considered.

- 3.4.3 There has been an extensive and iterative process of routing and site selection with wide levels of public and stakeholder engagement. Details of the pre-application consultation process are set out in section 3 of the **5.1 Consultation Report [APP-066]**.
- 3.4.4 Alternatives and routing are also addressed in **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]**.
- 3.4.5 The Applicant notes the matter raised in Local Impact Reports regarding the selection of overhead lines and underground cables at various locations. Issues raised include:
- There are clear inconsistencies in the Applicant's approach to undergrounding versus overhead pylons
 - Decision not to underground in specific areas. This includes areas such as the Waveney Valley, Great Waltham and Little Waltham, Dunton Hills Garden Village, and Ardleigh
 - Alternative approaches to the current lattice pylon scheme — including offshore connections and HVDC undergrounding — should be explored in greater detail to establish whether they could deliver better overall environmental outcomes
 - Where proposed, the areas of undergrounding are supported due to the reduction of visual impact on sensitive landscapes, but Essex Council is conscious of the concerns regarding the visual impact of the remaining sections of overhead lines

Response to the view that there are inconsistencies in the approach to undergrounding versus overhead lines.

- 3.4.6 The Applicant is required to develop proposals in line with national policy and its regulatory duties.
- 3.4.7 Overarching National Policy Statement (NPS) for Energy (EN-1) (2024) identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible. In terms of the consideration of alternatives as part of the examination of the substantive case, NPS EN-1 indicates, first, that the consideration of alternatives should be carried out in a proportionate manner, and second, that only alternatives that can meet the objectives of the proposed development need to be considered.
- 3.4.8 NPS for Electricity Networks Infrastructure (EN-5) (2024) Paragraph 2.9.7 sets out that *'While the government does not believe that the development of overhead lines is incompatible in principle with applicants' statutory duty under Schedule 9 to the Electricity Act 1989, to have regard to visual and landscape amenity and to reasonably mitigate possible impacts thereon, in practice new overhead lines can give rise to adverse landscape and visual impacts.'*
- 3.4.9 NPS EN-5 Paragraph 2.9.14 sets out that 'Where the nature or proposed route of an overhead line will likely result in particularly significant landscape and visual impacts,

as would be assessed through landscape, seascape and visual impact assessment, the applicant should demonstrate that they have given due consideration to the costs and benefits of feasible alternatives to the overhead line. This could include – where appropriate – re-routing, underground or subsea cables and the feasibility e.g. in cost, engineering or environmental terms of these.’

3.4.10 NPS EN-5 (2024) states:

‘2.9.20 Although it is the government’s position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, Broads, or Area of Outstanding Natural Beauty).

2.9.21 In these areas, and where harm to the landscape, visual amenity and natural beauty of these areas cannot feasibly be avoided by re-routing overhead lines, the strong starting presumption will be that the applicant should underground the relevant section of the line’.

- 3.4.11 As reported in the **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]** at the 2022 non-statutory consultation, the Applicant presented information on how the Project was evolving from the evaluation of strategic options to a preliminary preferred graduated swathe within which new infrastructure (pylons and underground cables) could be located as well as a proposed new substation site on the Tendring Peninsula. Following the conclusion of this consultation, the Applicant analysed the feedback received, and along with further technical studies and design work, developed the Project design ahead of the 2023 non-statutory consultation.
- 3.4.12 At the 2023 non-statutory consultation, the Applicant presented a preferred draft alignment showing indicative pylon positions, routes of underground cables, and potential locations of CSE compounds and connection substations. The feedback received at this consultation was considered alongside the findings of the Applicant’s ongoing environmental assessments and technical studies to help identify the proposals presented at statutory consultation.
- 3.4.13 At the 2024 statutory consultation, the Applicant presented a preferred draft alignment showing indicative pylon positions, routes of underground cables, new CSE compound locations and new connection substations. The feedback received at this consultation was considered alongside the findings of environmental and engineering studies to help identify the proposals presented at targeted consultation.
- 3.4.14 The Applicant has carefully considered the feedback proposing the use of underground cable along the route, the alternatives available, and other relevant considerations. These include our duties and obligations under various legislation encompassing consideration of cost, environment, socio-economic and engineering factors.
- 3.4.15 Alternatives have been fully considered throughout development. The Project has been designed in line with NPS EN-5, which sets a strong starting presumption in favour of overhead lines for new electricity transmission infrastructure. This strong starting presumption remains even when there is a high likelihood of significant impact and is only reversed for nationally designated landscapes. Except in nationally designated landscapes, underground or offshore alternatives are only preferred when their benefits outweigh any extra economic, social, or environmental impacts.

- 3.4.16 The Applicant has rigorously tested all realistic alternatives to assess those impacts, including onshore AC cable, AC gas insulated line, HVDC options, and offshore AC and HVDC solutions. Option selection has been driven by a balanced assessment of technical, environmental, socioeconomic, programme and cost considerations, all of which were clearly presented at each stage of consultation. In every case, onshore and offshore HVDC alternatives were substantially more expensive than overhead line solutions, while failing to provide equivalent system flexibility or full capacity.
- 3.4.17 Strategic alternatives for the Project, including underground cables and offshore cables, have been considered and are set out in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** and **7.17 Strategic Options Backcheck and Review [APP-355]**. These set out the need case for the Project and the reasoning why an onshore solution (including a mix of overhead lines and underground cable) has been taken forward. The Applicant has a statutory duty to facilitate new connections and maintain a safe National Electricity Transmission System **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 National Policy Statement for Electricity Networks infrastructure EN-5 (2024). These include:
- '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')'.
- 3.4.18 Both Conditions D2 and D3 oblige National Grid to ensure sufficient capacity is in place for connections and system reinforcements to reach compliance with the NETS SQSS. The Project would facilitate the connection agreements that are in place with two offshore wind farm projects and an interconnector project based on their connection into the EACN Substation. The Project would also reinforce the local transmission network which currently does not have the capacity needed to reliably and securely transport all the energy that is likely to be connected in the future, driven by the government's plan to increase offshore wind from the current 8.5 GW to 50 GW by 2030 to meet the increased demand. This ambition has been emphasised in the National Energy System Operator's (NESO) Clean Power 2030¹⁶ report. The need case is reviewed at each critical stage of the Project's development and without a robust demonstrable need, the Project would be revised or fall away. Currently, the contracted generation as contained in both the National Energy System Operator (NESO) Transmission Entry Capacity Register¹⁷ and the NESO Electricity Ten Year Statement shows a clear need for the Project. The most recent update was completed to capture the latest information as of June 2025, set out in **7.17 Strategic Options Backcheck and Review [APP-355]**.
- 3.4.19 The Project subject to the application for development consent includes:
- Approximately 159 km of new overhead line supported on approximately 509 pylons, either standard steel lattice pylons (approximately 50 m in height) or low

¹⁶ National Energy System Operator (2024) Clean power 2030

¹⁷ National Energy System Operator (NESO) (2026) *Transmission Entry Capacity Register*

height steel lattice pylons (approximately 40 m in height) and some of which would be gantries (typically up to 15 m in height) within proposed Cable Sealing End (CSE) compounds or existing or proposed substations

- Approximately 21 km of 400 kV underground cabling, some of which would be located through the Dedham Vale National Landscape (formerly known as an Area of Outstanding Natural Beauty).

3.4.20 Underground cables are proposed in four locations, including through the Dedham Vale National Landscape. The Dedham Vale National Landscape is a nationally important and designated landscape. With the proposed underground cable, the effects on views and setting would be reduced. This would also reduce effects on the setting of heritage assets located within the National Landscape. In all areas where underground cables have been proposed as a part of the Project, this has been after the local environment and habitats have been assessed, and the mitigation hierarchy and mitigation measures applied to reduce the impacts as far as possible, and where the selection of cable is required by technical considerations (e.g. crossing another 400 kV overhead line) or selection is justified by the relevant tests in NPS EN-5.

Response: alternative approaches to the current lattice pylon scheme — including offshore connections and HVDC undergrounding — should be explored in greater detail to establish whether they could deliver better overall environmental outcomes

3.4.21 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. **5.15 Design Development Report [APP-122]** 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.

3.4.22 The Applicant 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. As set out in Table 2.1 of The Applicants Response to the Open Floor Hearings (document reference 8.5.4) 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. As set out in **7.19 2023 Strategic Options Backcheck and Review [APP-357]** Chapter 15 Strategic options appraisal conclusions, 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). Even with cable sections identified to provide appropriate mitigation, costs remain below half that of HVDC alternatives with the less technical advantages.

3.4.23 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 Standards¹⁸. 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.

- 3.4.24 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.

Response: Identification of specific locations for undergrounding

- 3.4.25 The Applicant has correctly applied the policy tests in identifying locations for undergrounding. Further consideration of the potential to underground at Waveney Valley, Great and Little Waltham, Dunton Hills Garden Village and Ardleigh are provided in other sections of this chapter, and in **5.15 Design Development Report [APP-122]**.

Conclusion

- 3.4.26 In accordance with NPS EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in **5.15 Design Development Report [APP-122]** and **5.6 Planning Statement [APP-085]**. The Project has therefore complied with the relevant EN-5 policies on undergrounding.

3.5 Alternatives - Waveney Valley

Local Authority Positions

- 3.5.1 Two Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 3.4 Alternatives - Waveney Valley - Local Impact Report coverage

Local Authority	Paragraph(s) covering this topic
Norfolk County Council	11.2, 11.24 - 11.30
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	13.6 - 13.7
Essex County Council	N/A
Thurrock Council	N/A
South Norfolk District Council	N/A
Tendring District Council	N/A
Colchester City Council	N/A

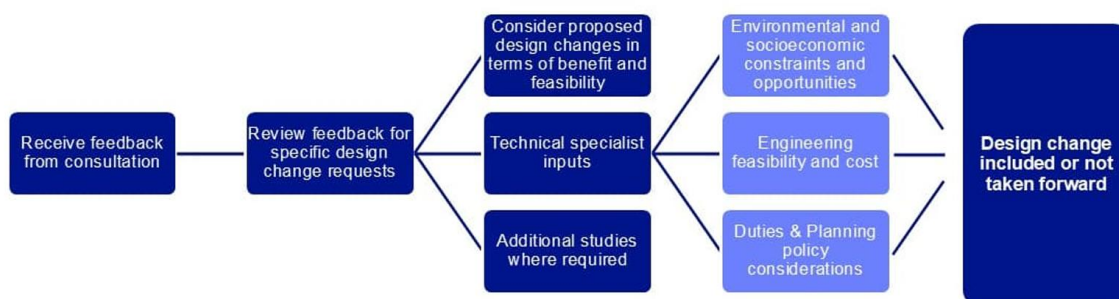
¹⁸ National Electricity Transmission System Security and Quality of Supply Standard, Version 2, 10.9 April 2025
<https://www.neso.energy/document/358751/download>

Local Authority	Paragraph(s) covering this topic
Braintree District Council	N/A
Chelmsford City Council	N/A
Brentwood Borough Council	N/A

The Applicant's Position

- 3.5.2 Responses in respect of the Waveney Valley have been considered and can be distilled into a number of overarching themes. The Applicant's response is set out below with further detail available if required as identified in other submitted material **Section 4.6 of 5.15 Design Development Report [APP-122]** and in Table 3.17 page 106) of the **6.3 ES Chapter 3 Alternatives [APP-127]**.
- 3.5.3 At statutory consultation, the Applicant presented two possible approaches for the Project to cross the Waveney Valley on the Norfolk and Suffolk border. This included an overhead line alternative and underground cable alternative (referred to as the Waveney Valley Alternative (WVA)). The Applicant considered the feedback received as part of the design change process. Feedback suggesting that underground cables are used in this section as part of the Waveney Valley Alternative was carefully considered, alongside feedback received and further technical information reviewed that helped to inform balanced decision making **5.1 Consultation Report [APP-066]**.

Image 3.9 National Grid's Design Change Process



- 3.5.4 Underground cable installation through the Waveney Valley would cause significant ecological harm that is avoided entirely by overhead line. Open-cut trenching through the valley floor would damage or destroy lowland fen — a priority habitat — and create adverse hydrological effects on the adjacent Wortham Ling SSSI and Roydon Fen County Wildlife Site. Extensive tree removal and substantial disturbance to high organic matter (peaty) soils would be required, with irreplaceable habitat loss. The overhead line, by contrast, passes over sensitive features with minimal ground disturbance, limited to pylon bases.
- 3.5.5 Ground investigation studies have confirmed the geology of the valley as a shallow layer of peat/high organic matter soils (though it has not yet been confirmed whether there are any areas of active peat formation) over sand/gravel which presents technical risks to the successful use of trenchless techniques. Horizontal directional drilling (HDD) continues to be considered to be limited to a distance of around 150 m, with its use potentially further complicated by a number of field study investigations encountering artesian water at a depth of around 10 m.

Response – Overhead line is the appropriate technology choice at the Waveney Valley

- 3.5.6 The Local Impact Reports (LIRs) note concern from the relevant Local Planning Authorities (LPAs) regarding the decision not to progress with the Waveney Valley Alternative, which would have comprised an approximately 2 km section of buried cable. The Applicant's decision on this was carefully considered drawing from environmental, technical and socio-economic factors in accordance with the NPS policy framework.
- 3.5.7 The decision-making policy context is that paragraph 2.9.20 of NPS EN-5 directs that overhead line should be the strong starting presumption for electricity network developments in general. That strong starting presumption is only reversed for nationally designated landscapes. It is not displaced where there is a high potential for widespread and significant adverse effects, but directs at paragraphs 2.9.23 to 2.9.25 that in those circumstances, the Secretary of State should only prefer underground or subsea solutions where their benefits clearly outweigh any extra economic, social or environmental impacts, applying the test set out in NPS EN-5. The Applicant has applied the strong starting presumption of overhead lines in the correct places, and it has reversed that presumption in the circumstances of the National Landscape.
- 3.5.8 Our response to **8.5.3 Applicant's Written Summary of Oral Submission and Responses to Action Points for Issue Specific Hearing 1 (REP1-139)** sets out the strong starting presumption for the use of overhead lattice pylons for new connections with change from this in particular circumstances. For the undesignated Waveney Valley, albeit recognising it is locally valued, the predicted landscape and visual effects do not meet the thresholds to engage National Policy Statement (NPS) EN-5 (2024) paragraph 2.9.23 (given effects are not assessed as being widespread).
- 3.5.9 Heritage effects have been reviewed with Historic England and are assessed as resulting in less than substantial harm to the Grade I St Remigius Church and are not at a level that requires a change of technology.
- 3.5.10 Considering feedback from the 2024 statutory consultation and refinement of the overhead line design (as part of the Project design change process – see the image above), it was concluded that a solution that includes the use of underground cable would not be acceptable. It is acknowledged that there would be effects arising from overhead line infrastructure, but the level of such effects is not considered to meet the requirements set out at paragraph 2.9.23 to 2.9.25 of NPS EN-5 (2024) in this area, which is not subject to a National Landscape designation. Additionally different undergrounding methods may either give rise to a high level of impact on trees, high organic matter soils or the Waveney and Little Ouse Landscape Recovery (WaLOR) scheme; present unacceptable risks to cable integrity; or are at a level of cost inconsistent with National Grid's duties under the Electricity Act 1989 and relevant planning policy (i.e. NPS EN-5 (2024)).
- 3.5.11 WaLOR is Defra funded and considered a pilot for other similar projects in the region with the aim to re-naturalise the River Waveney and the surrounding habitats. The WaLOR project aim is to enhance the natural heritage of the landscape and combat declines in biodiversity – whilst performing climate enhancing change. Although the land is not ecologically designated, the WaLOR project will enhance the surrounding landscape of the Waveney and Little Ouse Valley Fens Special Area of Conservation (SAC) and Redgrave and South Lopham Fens Ramsar site.

- 3.5.12 It was therefore concluded that an overhead line is the most appropriate solution for this section, with the final arrangement including one less pylon and a modified alignment compared with that presented at the statutory consultation. Section 4.6 of **5.15 Design Development Report [APP-122]** provides further detail in relation to the decision making around the mitigation embedded into the design of the Project in this locality which includes realignment and repositioning of a pylon to reduce interaction with the WaLOR scheme, a landscape recovery scheme which is located in the same geographic area, and the removal of one pylon.

Response – Underground cable presents unacceptable effects for the Waveney Valley

- 3.5.13 With the potential for others to take a contrary view on the application of paragraph 2.9.23 of EN-5, the Applicant has considered whether the consequences of progressing the alternative, i.e. an underground cable, could be justified. Ground conditions, however, were found to be unfavourable and to not be able to support lengthy trenchless installation, along with potential for cables installed by trenching to give rise to impact on the Waveney and Little Ouse Recovery (WaLOR) project, a key strategic site within the Local Nature Recovery Strategy (LNRS) and a flagship scheme for DEFRA and the EA for river and wetland habitat restoration. Further detail is provided in Section 4.6 of **5.15 Design Development Report [APP-122]** which concludes that whilst there are some benefits through use of cabling, in the form of not introducing new structures into views, installation using a trenchless technique such as Horizontal Directional Drilling would result in ecological effects from installation within high organic matter soils, as it could not achieve sufficient drill distance. This would result in cables installed partly by HDD and partly by open cut techniques with increased technical risk to cable integrity from the WaLOR project river channel naturalisation.
- 3.5.14 Avoiding such effects would necessitate tunnelling. The 2025 Institute of Engineering and Technology Report 'A comparison of electricity transmission technologies: costs and characteristics' indicates that tunnelling is in the order of 11 to 12 times the cost of overhead line, though the Applicant notes that experience on other short tunnels suggests this may underestimate the cost with costs expected to be in excess of £200 million. In line with the Applicant's duties (see **8.5.3 Applicant's Written Summary of Oral Submission and Responses to Action Points for Issue Specific Hearing 1 (REP1-139)**), which include under the Electricity Act 1989 duty to be economic and efficient, and the Secretary of State decision-making criteria in NPS EN-5 (2024) (from paragraph 2.9.24), the Applicant is clear that in accordance with policy there is no justification for the use of underground cables in this location.

Response – The alignment provides a policy compliant balance between factors

- 3.5.15 The LIRs have identified concerns about the impact of the pylon alignment on the Angles Way recreational route, heritage assets including St Remigius Church, as well as the requirement for mitigation/compensation for landscape effects. The Angles Way would be crossed by all alternative alignments, whether east or west of Diss. All alternative routes would be subject to effects on other Grade I churches, but at greater levels. The alignment is also constrained by the WaLOR project. Routeing has to balance the potential effects on heritage assets, the WaLOR project, landscape and views and the experience of users of the Angles Way. An assessment of effects on the Angles Way has been undertaken as part of the 'Assessment of

Effects on Routes' within section 13.12 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229]**. The effects are assessed and set out in the Environmental Statement and explained in **5.15 Design Development Report [APP-122]**, and it is the Applicant's position that the Project accords with national policy as set out above.

- 3.5.16 The Applicant's approach to mitigation is addressed in Chapter 2 (Overarching Policy Context) of this document, and the approach to landscape and visual mitigation and compensation including the potential to support the WaLOR project, is summarised in the Landscape and Visual - Landscape Compensation section in Chapter 3 of this document.
- 3.5.17 Whilst compensation is part of the mitigation hierarchy, National Policy Statement (NPS) EN-1 (2024) or NPS 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.
- 3.5.18 NPS EN-5 (2024) paragraph 2.9.11 is also explicit that mitigation is not expected to result in the removal of landscape and visual effects for overhead lines 'and the impossibility of full mitigation in these cases does not countermand the need for overhead lines'.
- 3.5.19 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.
- 3.5.20 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. The NPS position in relation to compensation (as set out above) is also consistent with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regs). There is no requirement under the said Regulations for all residual effects to be compensated.

3.6 Alternatives – East Anglia Connection Node Substation Siting and Connection Routeing at Ardleigh

Local Authority Positions

- 3.6.1 Four Local Impact Reports raised this topic. The table below identifies the paragraphs in the Local Impact Reports providing the key points for the Applicant's response, noting that these paragraphs are often related to additional, adjacent paragraphs. The table below excludes references to the locations covered in this section interpreted in terms of Project Description or locational references:

Table 3.5 Alternatives – East Anglia Connection Node Substation Siting and Connection Routeing at Ardleigh - Local Impact Report coverage

Local Authority	Paragraph(s) covering this topic
Norfolk County Council	N/A
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	13.102
Essex County Council	4.4.14, 4.4.28, 4.4.35, 4.5.102, 4.6.33, 4.9.46, 4.10.24, 4.10.26, 4.11.5, 4.13.14, 4.13.26
Thurrock Council	N/A
South Norfolk District Council	N/A
Tendring District Council	2.7, 2.9 – 2.10, 3.5, 6.5, 6.12, Section 7, 8.14, 8.15, 8.25, 9.1, 10.4, 10.7, 10.9, 10.14, 10.25 to 10.28, 12.1 to 12.5, 13.1, 13.4, 13.7, 13.10, 13.14, 13.22, 13.26, 14.5 to 14.14, 15.1 to 15.3, 15.9 to 15.13, 16.2, 16.10 – 16.12, 16.18, 16.23, 17.1, 19.1, 19.5, 20.20
Colchester City Council	10.28, 10.39, 12.187, 12.189, 12.253
Braintree District Council	N/A
Chelmsford City Council	N/A
Brentwood Borough Council	N/A

The Applicant's Position

3.6.2 This section responds to matters raised in LIRs that relate to the siting of the East Anglia Connection Node (EACN) Substation and the routeing of the overhead line in the vicinity of Ardleigh. The two aspects are closely related and are therefore dealt with together. The Applicant notes the matters raised in LIRs regarding these aspects and has grouped them into a series of themes for the purposes of responding. Matters raised on site-specific environmental topics are responded to within Chapter 4 of this document. The themes identified are as follows and are responded to by various response points below:

- The extent to which National Policy Statements (NPS) including Overarching for Energy (EN-1 (2024)) and Electricity Networks Infrastructure (EN-5 (2024)) allow for some effects to be acceptable; and rationalising this with a perceived need to progress a Project with least effects
- Approach to application of the guidance provided by the Holford Rules¹⁹ and Horlock Rules²⁰ and the influence of the presence of homes, environmental features and constraints on the design outcome from a multi-factorial balanced decision making
- The robustness of the EACN Substation siting and continued justification for the location to the east of Ardleigh compared with others

¹⁹ The National Grid Company (1959) The Holford Rules

²⁰ National Grid (2009) The Horlock Rules

- Whether timing of site identification is or has been a factor
- The acceptability of the arrangements for construction traffic access to the EACN and of the shared approach with North Falls and Five Estuaries Wind Farms
- The acceptability of overhead line routeing at Ardleigh and the justification for not deploying elements higher up the mitigation hierarchy

3.6.3 The decision making policy context is that paragraph 2.9.20 of NPS EN-5 directs that overhead line should be the strong starting presumption for electricity network developments in general. That strong starting presumption is only reversed for nationally designated landscapes. It is not displaced where there is a high potential for widespread and significant adverse effects, but directs at paragraphs 2.9.23 to 2.9.25 that in those circumstances, the Secretary of State should only prefer underground or subsea solutions where their benefits clearly outweigh any extra economic, social or environmental impacts, applying the test set out in NPS EN-5. The Applicant has applied the strong starting presumption of overhead lines in the correct places, and it has reversed that presumption in the circumstances of the National Landscape.

3.6.4 The preliminary location for the EACN Substation was developed as set out in **7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356]** as part of an iterative process also considering the onward connections. That document identifies the alternative sites considered at that stage of study. Other locations to the west of the A12, including the former Royal Air Force Boxted, have been considered as they have been raised through consultation and the Applicant's position on them set out in the various **Design Development Reports [APP-122, APP-358, APP-359 and APP-360]**. Whilst noting that routeing through the National Landscape is not in conflict with NPS EN-1 and NPS EN-5, there were alternatives considered that would avoid routeing through the National Landscape.

Response – The Project is consistent with policy and is not required to have least overall or least residual effects, nor present like-for-like comparisons

3.6.5 Part of the preference for other sites, connection routes or technology expressed in the LIRs arises from an assumption that if the other routes / sites have lower effects then they should be preferred. We set out in the Good Design section of this document that the Applicant's position is that the consent decision is made on the acceptability of each individual scheme and the balance of benefits and disbenefits it brings, rather than on the basis of which scheme is perceived to have lower effects in the context of the relevant policy. It is therefore immaterial whether an alternative has (or is perceived to have) lower effects and instead the decision is based on the particular assessment of the submitted scheme. As is set out below, the Applicant's position is that the Project represents the outcome of balanced decision making. Other alternatives favoured by other parties may well provide deliverable solutions and, from some perspectives, a preferred arrangement, however, that is not the relevant test. The Applicant considers that other sites and arrangements are less preferred for reasons set out from section 6.5 in **5.15 Design Development Report [APP-122]**.

3.6.6 For any Applicant there is no requirement to present comparative detail for each of multiple alternatives. There needs to be an assessment (for an Environmental Impact Assessment (EIA) project) of the environmental effects and reporting of the alternatives studied and reasons for not selecting them, and these have formed part of the submission. The requests to provide assessments of alternatives, and

suggestions that the submitted Project has not been justified relative to these other alternatives, are not requirements that need to be met. The Project stands to be evaluated on its own merits against the relevant planning policies and not against alternatives that others may prefer, as supported by NPS EN-1 paragraphs 4.3.22 to 4.3.24 to meet the Need Case requirement (see Chapter 2 – Overarching Policy Context).

Response - Route and pylon selection is based on balanced decision making and accords with policy and the guidance in the Holford and Horlock Rules

- 3.6.7 As stated previously in our **8.5.3 Applicant's Written Summary of Oral Submission and Responses to Action Points for Issue Specific Hearing 1 (REP1-139)**, the Applicant is required to develop proposals in line with national policy and its regulatory requirement. We also expand, in the Good Design section of this document, on how we develop routeing in practice and make balanced decisions considering factors including the presence of homes, constraints, environmental and socio-economic effects as well as technical and cost considerations. In overview, the Holford and Horlock Rules seek to reduce any adverse impacts associated with new overhead lines and substations through the adoption of a series of 'common sense' principles. The seven Holford Rules and supplementary notes and Horlock Rules are identified in Chapter 5 of **7.15 Design and Access Statement [APP-353]**. They seek to inform routeing and siting decisions by guiding infrastructure away from areas of the highest amenity value. They also encourage particular design outcomes though it is clear from the caveats within the wording of different rules that balanced decision-making judgements are required on a case-by-case basis. Depending on the element or elements being positioned this may be informed by the circumstances of different locations, how they may relate to each other and to other elements.
- 3.6.8 We consider the environmental effects to inform the balance and define our proposals that we take forward, which are also informed by feedback. We would note that application of the Holford and Horlock Rules typically involves balancing alternative solutions which can present conflicting rule compliance. For example, routeing over relatively high ground rather than in an adjacent valley may conflict with Holford Rule 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Holford Rule 2. Throughout the routeing and siting, the application of the rules required a careful balance of the competing constraints and the opportunities to identify what, on balance of the relevant factors, is the preferred solution.

Response - The robustness of the EACN Substation siting and continued justification for the location to the east of Ardleigh.

- 3.6.9 The LIRs seek to suggest that the EACN Substation has been sited for 'customer convenience', a position that the Applicant asserts is incorrect. If that were the case, then the substation would logically have been positioned closer to the coast with parallel 400 kV connections through the spine of the undesignated Tendring Peninsula. The Applicant has been clear throughout the development process (most recently expressed at paragraph 6.5.8 of **5.15 Design Development Report [APP 122]**) that siting has considered regulatory, environmental and social considerations and '*balances factors relating to substation aspects [...] with factors relating to the electrical connections to them*'. This has a number of implications:

- The 400 kV connection requires circuit connections to two parts of the network, hence the preference to incorporate the connection into the reinforcement from Norwich to Bramford to Tilbury
- It also means that movement of the EACN Substation needs to consider the consequences for the different connections being made to it and be justified by reference to the relevant considerations (i.e. the rules). In this case the connections of both the 400 kV infrastructure and the customer connections (North Falls, Five Estuaries and Tarchon).
- As set out from paragraph 6.5.8 of **5.15 Design Development Report [APP-122]**, whilst sites further west are potentially available, there are clear reasons why they are less preferred and likewise why sites closer to the coast were similarly less preferred. It is therefore irrelevant which infrastructure leads to an effect but important just that the effects and consequences are considered.

3.6.10 Considering also the points made above that there is no requirement to take forward the Project with the least effects from one or other perspective, we have set out on multiple occasions (e.g. in APP-122 as below) the additional implications associated with sites west of the A12 and do also recognise the potential benefits. As set out at paragraph 6.5.21 of **5.15 Design Development Report [APP-122]**, we concluded that *‘the multiple aspects of uncertainty and construction risk, along with a reduction in future flexibility and increased risks to programme for the customers and for National Grid, which are associated with the potential constraint costs arising from such delays, do not justify the benefits potentially provided by the alternative site at the former RAF Buxted Airfield. In light of this, there is a continued preference for locating the EACN Substation to the north of the Lawford Substation.’*

Response - The acceptability of overhead line routeing at Ardleigh and the justification for not deploying the use of underground cable

3.6.11 The Applicant would inform the ExA that a double overhead line was originally considered north of Ardleigh but following an iterative design and assessment process this was felt to be unacceptable. Therefore the Project design was changed to incorporate underground cable through the National Landscape and continued through to the EACN Substation.

3.6.12 The LIRs also infer that overhead line use is unacceptable for the route around Ardleigh. The Applicant’s position is that on balance it does not consider this to be the case, and even if others took a contrary view, it considers that the cost of the change to underground cable is not justified. The site is not within the National Landscape and the level of effect experienced within the National Landscape as a result of the pylons which are outside the National Landscape does not meet the thresholds in NPS EN-1 paragraph 5.10.34. This is set out in the **Design Development Report (APP-122)**, from paragraph 6.5.24.

3.6.13 Much is made of the changes of direction, but as noted above, whilst the Holford Rules would guide to a preference for a straighter route, there is a wider balance that has to be struck and there is no basis to consider the route to be unacceptable. There are undoubtedly locations where pylons may be visible in multiple directions, but it is also true that the presence of buildings and mature trees leads to filtering in many views. We conclude that there is no policy basis to consider the overhead line to be unacceptable, but also recognise that others may take a contrary view.

- 3.6.14 We have reported in **5.15 Design Development Report [APP-122]** that there are some challenges to the use of underground cable for the connections to Bramford and to Tilbury. These include:
- Technical constraints to both 400 kV connections entering the EACN Substation as cable
 - Implications for mineral sterilisation of silica sand
 - Technical implications on the crossing of the railway potentially requiring the use of ventilated tunnel.
- 3.6.15 Taking all factors into account and with a cost estimated at between £80m and £135m, it is not considered that a second section of cable at Ardleigh can be justified.

The acceptability of the arrangements for construction traffic access to the EACN Substation and of the shared approach with North Falls and Five Estuaries Wind Farms

- 3.6.16 Alternative access arrangements to the EACN Substation were subject to consultation with highway authorities and presented in Table 3.19 of **6.3 Environmental Statement Chapter 3 Alternatives [APP-127]**. Very little in the way of feedback has been received to date. Alternatives leave the A120 at different points with much longer sections routed over farmland and retained for the Abnormal Indivisible Load route through the operational phase. As a result of the greater effects on landowners, the option to enhance a section of Bentley Road was favoured on the basis that initial assessments including the consideration of cumulative effects with the two wind farms were that the construction phase effects were acceptable and there would be legacy benefit of a widened road.
- 3.6.17 However, on the basis of the assessments undertaken and mitigation measures proposed within the Application, the Applicant does not consider that the residual traffic and transport impacts arising from the Project will be excessively severe as suggested in the LIRs. Further detail is provided in the Traffic and Transport section in Chapter 4 of this document. The Applicant's position therefore remains that the widening of Bentley Road is preferable and is acceptable in policy terms. We do not agree with the assertion that this is a basis to take forward a different site. Other locations will require some use of public highway and based on potential routes to alternative sites, are likely to see similar situations arise with vehicles having to pass residential property at close proximity. This transfer of effects is not a basis to make a change.
- 3.6.18 Overall, the Applicant's position is that the site to the east of Ardleigh is an appropriate location for the EACN Substation, can be developed in a manner that is consistent with policy, and that the 400 kV connections are similarly consistent with policy.

Timing of site identification

- 3.6.19 The LIRs seek to understand the timing of decision making regarding the EACN Substation. Firstly, it is to be noted that where necessary, the Applicant has demonstrated that it is open to making changes to the design of the Project, most notably, introducing the Tilbury North Substation following consideration of the feedback from statutory consultation which occurred in 2024. In respect of alternatives to the EACN Substation, the Applicant's position is that the timing of the

identification of sites is not and has not been relevant. Decision making has been informed by constraints and the requirement for additional corridors among other factors.

3.7 Alternatives - Great and Little Waltham

Local Authority Positions

- 3.7.1 One Local Impact Report raised this topic in the following sections of the Local Impact Reports:

Table 3.6 Alternatives - Great and Little Waltham - Local Impact Report coverage

Local Authority	Paragraph(s) covering this topic
Norfolk County Council	N/A
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	N/A
Essex County Council	Locational context references only
Thurrock Council	N/A
South Norfolk District Council	N/A
Tendring District Council	N/A
Colchester City Council	N/A
Braintree District Council	N/A
Chelmsford City Council	8.54 iii, 8.55, 8.523
Brentwood Borough Council	N/A

The Applicant's Position

- 3.7.2 The Local Impact Report (LIRs) from Chelmsford City Council [REP1-153] raised concerns about the selection of an overhead lattice pylon route, with several low height pylons, between Great and Little Waltham. Matters of concern relate to general routeing and the Applicants preference for this route rather than other alternatives, and to particular pylon selection and positioning south of the River Chelmer. Other matters relating to specific environmental effects are covered in Chapter 4 of this document. The Essex County Council LIR makes locational references only [REP1-161].

Response – Applicant confirmation of pylon selection and position south of the River Chelmer

- 3.7.3 The Applicant gave consideration to the use of low height pylons in circumstances where standard lattice pylons were considered to be inconsistent with policy. These low height design lattice pylons are useful where height is a strong consideration; however, they also occupy a greater footprint and have a wider profile. They can therefore provide visual benefits in some scenarios, for example where a reduction in pylon height means that views of the tops of pylons are screened/filtered by intervening woodland. In other scenarios they can increase adverse visual effects, for

example where relatively close to visual receptors, without intervening filtering by vegetation, where they are likely to appear more noticeable in views from residential receptors.

- 3.7.4 The Applicant proposed lower height pylons after reviewing feedback following the 2024 statutory consultation both to the north (four pylons) and south (three pylons) of the River Chelmer. North of the River Chelmer, low height lattice pylons were proposed as necessary to reduce effects on the adjacent Langleys (Grade I listed building) and the adjacent registered park and garden. The Applicant became aware after the responses to 2025 targeted consultation, of specific concerns regarding the three low height pylons south of the River Chelmer, suggesting reversion to standard lattice pylons and particularly TB141, proposed to the side of a residential property at 70 to 80 metres distance.
- 3.7.5 The Applicant identified, in **5.15 Design Development Report [APP-122]** at paragraph 9.2.16, their consideration of this, and included a change to proposed Limits of Deviation as Scenario 19 (in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**) to respond to this concern. The Applicant subsequently agreed (subject to Examining Authority's approval) to replace the three lower height pylons to the south of the River Chelmer with two repositioned standard lattice pylons. This will move the nearest pylon to around 150 metres from the property, compared with around 70 to 80 metres, therefore addressing this aspect. This has now been confirmed by the Applicant and advised to the ExA in **8.5.3 Applicant's Written Summary of Oral Submission and Responses to Action Points for Issue Specific Hearing 1 [REP1-139]**.

Response – The Project is consistent with policy and is not required to have least overall or least residual effects

- 3.7.6 As is set out below, the Applicant's position is that the Project as submitted represents the outcome of balanced decision making and is the preferred design. Other alternatives favoured by other parties may well provide deliverable solutions, and from some perspectives a preferred arrangement, however that is not the relevant test.
- 3.7.7 Part of the preference for other connection routes or technology expressed in LIRs arises from an assumption that if the other routes would result in lower levels of effects, then they should be preferred. In the section on Good Design in Chapter 3 of this document, it is explained that the Applicant's position is that the decision regarding consent will be made based on the acceptability of the individual scheme, and the balance of benefits and disbenefits it brings. It is not based on which route is perceived to result in lower levels of effects, in the context of the relevant policy.
- 3.7.8 Firstly the Applicant asserts that its submitted scheme represents its preferred design when judged in the context of the duties and policies that define the scope of its decision making. Secondly it is the Applicants position that it is not relevant that an alternative route is perceived by others to result in lower levels of effects. Instead, the decision will be based on the assessment of the Applicants submitted scheme with the decision made on the planning balance and whether the project benefits outweigh (local) environmental effects.

Response – Route and pylon selection is based on balanced decision making and accords with policy

- 3.7.9 As stated previously in **8.5.3 Applicant's Written Summary of Oral Submission and Responses to Action Points for Issue Specific Hearing 1 [REP1-139]**, the Applicant is required to develop proposals in line with national policy and its regulatory requirements. How we develop routeing in practice, and make balanced decisions which consider factors including the presence of homes, constraints, environmental and socio-economic effects, as well as technical and cost considerations, is expanded upon in the Good Design section of this document.
- 3.7.10 The decision-making policy context is that paragraph 2.9.20 of NPS EN-5 directs that overhead line should be the strong starting presumption for electricity network developments in general. That strong starting presumption is only reversed for nationally designated landscapes. It is not displaced where there is a high potential for widespread and significant adverse effects, but directs at paragraphs 2.9.23 to 2.9.25 that in those circumstances, the Secretary of State should only prefer underground or subsea solutions where their benefits clearly outweigh any extra economic, social or environmental impacts, applying the test set out in NPS EN-5. The Applicant has applied the strong starting presumption of overhead lines in the correct places, and it has reversed that presumption in the circumstances of the National Landscape.
- 3.7.11 Around Great and Little Waltham, the Applicant considered alternative route alignments, other pylon types and the use of underground cable - see **5.15 Design Development Report [APP-122]** from paragraph 9.2.17. In summary:
- Alternative routes were considered less preferred (**5.15 Design Development Report [APP-122]**, from fifth bullet paragraph 9.2.4). Routes further to the west of Chelmsford and routes further to the east (close to existing overhead lines) were considered. All would result in environmental effects, albeit in a different combination, and such routes are less preferred, due to their greater length, specific constraints relating to, or effects of routeing.
 - The proposed use of a number of low height lattice pylons was beneficial (**5.15 Design Development Report [APP-122]**, from paragraph 9.2.16) subject to the modifications noted above which has now been confirmed to progress with the standard lattice pylon design south of the river. The Project is therefore progressing with a section of four low height pylons to the north of the River Chelmer. This secures a position where heritage effects will result in less than substantial harm at the Grade I Langleys, and surrounding registered park and garden. Further detail on these and other heritage assets is provided in the Historic Environment section in Chapter 4 of this document.
 - It was set out in the section on Good Design that the consideration of T-pylons is undertaken within the mitigation hierarchy. In summary, the effects arising from lattice pylons are not considered unacceptable, and therefore further technology mitigation is not required. The Applicant also notes that T-Pylons would likely have significant adverse effects given their form as bulky solid structures.
 - The area does not fall within a nationally designated landscape or the setting of such a landscape, in terms that lead to the presumption to utilise underground cables (NPS EN-5 (2024) paragraph 2.9.20). Decision making about the use of underground cables is therefore guided by policy identified in NPS EN-5 (2024) including paragraphs 2.9.14, 2.9.23 and 2.9.25. The Applicant's position is that

the test against paragraph 2.9.23 of NPS EN-5 (2024) is not met, on the basis that landscape and visual effects are not widespread in this location, and neither are the effects arising from lattice pylons considered unacceptable in policy terms. Even if a contrary view was taken (which is not accepted by the Applicant), any such scheme of undergrounding is expected to require around a 2.5 km section of cable at a cost of around £80 to £100 million (**5.15 Design Development Report [APP-122]**, paragraph 9.2.17), which is not considered to be justified.

3.8 Alternatives - Dunton Hills Garden Village

Local Authority Positions

3.8.1 Two Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 3.7 Dunton Hills Garden Village - Local Impact Report coverage

Local Authority	Paragraph(s) covering this topic
Norfolk County Council	N/A
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	N/A
Essex County Council	4.3.1 - 4.3.79
Thurrock Council	N/A
South Norfolk District Council	N/A
Tendring District Council	N/A
Colchester City Council	N/A
Braintree District Council	N/A
Chelmsford City Council	N/A
Brentwood Borough Council	6.11 - 6.29

3.8.2 The Essex County Council (ECC) and Brentwood Borough Council (BBC) Local Impact Reports (LIRs) **[REP1-150 and REP1-161]** set out concerns with regard to Dunton Hills Garden Village (DHGV). The concern expressed is the likely effect that the Project will have on the viability and deliverability of the DHGV site. As such, the LIRs refer to:

- The Project degrading the design principles of DHGV, leading to a reduction in current and future land value and property prices to the detriment of its viability and deliverability
- The Project being contrary to the principles of good design and impact mitigation set out in National Policy Statement (NPS) EN-1 (2024) and NPS EN-5 (2024), Holford Rule 7 and to the garden community principles of Policy R01 (Dunton Hills Strategic Allocation) of the adopted Brentwood Local Plan²¹.

²¹ Brentwood Borough Council (2022) *Brentwood Local Plan 2016–2033*

- 3.8.3 In support of that position, the LIRs state:
- The proposed alignment of the overhead line in the south-east corner of DHGV would interrupt the safeguarded sightlines and views across the site, including those towards and between the Church of St Mary. These are considered a key design feature relating to heritage principles.
 - Pylon TB229 is proposed where a Local Equipment Area for Play (LEAP) is proposed such that the Project would render the DHGV Play Strategy undeliverable in full.
 - The Project would affect the robust nature of any planting along the eastern boundary in defining the Green Belt edge.
 - The Project must acknowledge the strategic importance of DHGV for housing in Brentwood, Basildon, and the South Essex Housing Market Area.
 - Concern that the Project will affect the delivery of affordable housing and supporting infrastructure.
- 3.8.4 Further in support of the above claims, appended to the ECC LIR is a report assessing how the Project will affect the deliverability of the Mandatory Principles upon which DHGV has been developed, and a report by Savills on the impact of the Project on the viability and deliverability of DHGV.
- 3.8.5 The Applicant provides comments on the report on the DHGV Mandatory Principles in this response as necessary. The Applicant acknowledges that it had been given the Savills report in advance of the LIRs being submitted and so provides general comments on that report in this response, with a more detailed response provided in Appendix B

The Applicant's Response

- 3.8.6 The Applicant can confirm that notwithstanding the statements in the LIRs, that the Project has considered DHGV during routeing and refinement of the alignment. The 2023 preferred draft alignment was amended to take forward a preference to follow the gas pipeline corridor (that runs along the eastern boundary of DHGV) for a greater distance, such that the overhead line would not introduce a new constraint in this location, having regard to DHGV.
- 3.8.7 The development of the Project from consideration of strategic options through to detailed siting of individual elements has been comprehensively set out in documents published in support of consultation and the development consent application. In relation to Dunton Hills Garden Village, this includes **5.1 Consultation Report [APP-066]** paragraphs 3.2.4 and 3.3.3, Tables 6.7, 9-8, 10-46 and 10.50; **5.15 Design Development Report [APP-122]** section 10.4; **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]** section 7.5, **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** section 12, **7.20 2023 - Design Development Report for the Project [APP-358]** paragraphs 3.2.12, 5.5.142 to 5.5.145, 6.3.1 and 6.4.145 to 6.4.148; and, **7.21 2024 - Design Development Report for the Project [APP-359]** paragraphs 5.3.21, 5.4.8 and 5.4.211 to 5.4.214.
- 3.8.8 The Applicant has adequately considered any potential impact of the Project on DHGV, in line with NPS EN-1 (2024) and NPS EN-5 (2024) and the Holford Rules.

- 3.8.9 The consideration of the guidance in the Holford and Horlock Rules has been consistently applied with due regard to other factors and respecting the flexibility inherently allowed for within the Rules. The guidance provided by the Rules has been applied throughout Project development. In **7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356]** published in 2022, and the Design Development Reports (DDRs) 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 for the Project [APP-122]**), all set out how the Holford and Horlock 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 Rules typically involves balancing alternative solutions which can present conflicting Rule compliance.
- 3.8.10 Throughout routeing and siting the application of the Rules has required a careful balance of competing constraints.
- 3.8.11 A literal interpretation is being applied by ECC on the application of the Holford Rules without consideration of the caveats that are inherent to the guidance which allow for deviation. At DHGV it is the Applicant's position that there are opportunities to design around the infrastructure to reduce effects and that effects are inherently controllable.
- 3.8.12 The Applicant does not therefore consider that the Project will result in any significant impact with regard to the viability of DHGV.
- 3.8.13 This position is supported by the Relevant Representation submitted by the new landowner, LIH Dunton Hills Limited (EN020027-000610) **[RR-0421]**. The LIH Relevant Representation in no way implies that the Project would affect the viability of DHGV. Indeed, it actually confirms that LIH supports the Project insofar as it will deliver the removal/undergrounding of the existing 132 kV overhead line, stating that this '*.... is a critical assumption underpinning the planning application scheme*'. LIH, having recently purchased the site, would therefore have done so being fully aware of the Project and any potential impacts it might have on the development of DHGV, yet they have raised no viability concerns in their Relevant Representation.
- 3.8.14 The LIRs do not actually indicate that DHGV, as allocated and as resolved to be approved under planning application 21/01525/OUT, cannot or will not be delivered as a result of the Project.
- 3.8.15 Indeed, the resolution to grant planning permission on 29 November 2023 confirms that BBC was content with the proposed development and the substantial progress of the Section 106 (s106) agreement at that time. This position was re-confirmed by the resolution on 29 July 2025 when BBC confirmed that the draft conditions and s106 obligations for the development were in accordance with the principles set out and agreed in the November 2023 report and the Council's decision to grant planning permission. When making these decisions BBC was aware of the Project.
- 3.8.16 As such, the Applicant's position is that deliverability of DHGV is not prejudiced by the Project.
- 3.8.17 The following sections take the matters raised in the LIRs, as set out above, in turn.
- 3.8.18 Firstly, however, as noted previously, ECC LIR relies on a report included as Appendix C of the LIR that intends to consider how the Mandatory Principles for

DHGV relating to Land Use and Spatial Organisation; Vistas, Access and Movement, Landscape, Heritage, Density and Heights may be affected by the Project.

- 3.8.19 It is noted that the Mandatory Principles used in the assessment are drawn from the Dunton Hills Garden Village Framework Masterplan (February 2020) rather than the later Dunton Hills Garden Village Supplementary Planning Document (January 2023).
- 3.8.20 Whilst the assessment purports to consider good design and makes reference to exclusion zones, there is no reference in it to the National Grid publication National Grid Design Guidelines for Development Near Pylons and High Voltage Overhead Power Lines. First published by National Grid in 2003 and updated in 2019. These guidelines were specifically developed by National Grid to address matters associated with developing sites crossed by, or in the vicinity of, pylons and overhead lines.
- 3.8.21 Furthermore, the identification of a limited number of Mandatory Principles in the assessment provides a perception that the Project would result in a greater impact on the DHGV than would be the case. For example, the Vistas, Access and Movement criteria group contains 12 Mandatory Principles, yet only three have been included within the assessment. The Applicant concurs that the Project would not impact on the Mandatory Principles that are not referred to, however their omission skews the perception of impact.
- 3.8.22 The Applicant's position is that the assessment has been undertaken with limited background understanding of how overhead lines and housing sites can be developed alongside one another, and that the assessment has been undertaken against a limited number of Mandatory Principles which infers that the Project would have a greater impact on DHGV.

Heritage Sightlines

- 3.8.23 The Applicant has considered alternative design solutions to position the pylon (which is to the west of the gas pipeline) further north or south. Either change requires an additional pylon and could result in a reduction in the area of development plots within DHGV. The historic environment assessment concluded a moderate adverse (significant) effect during construction and operation (and maintenance) phases for the Grade II listed Church of St Mary (1122253) and Dunton Hall (1338380) (**6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**) and a less than substantial harm conclusion for these listed buildings (**6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**). The assessment concluded no significant effects to other designated heritage assets in this area.
- 3.8.24 The Applicant remains confident in the conclusions of the assessment given that the existing 132 kV PSC2-10 pylons would be removed and replaced with a smaller number of taller 400 kV pylons as a result of the Project. Given the level of harm to the listed buildings does not constitute substantial harm, the Applicant's position is that this is not an unacceptable impact on the buildings nor on DHGV.

LEAP

- 3.8.25 Figure E of the ECC LIR does not confirm that the LEAP referred to will be directly affected by the overhead line. Conversely, the Relevant Representation submitted

by the landowner, LIH, [RR-0421] includes a plan at Appendix 8 that confirms that the pylon would not directly affect the location of the LEAP.

- 3.8.26 Even if there was to be a direct effect on the LEAP, given that the DHGV site extends to approximately 224 hectares and includes large areas of public open space and has only currently been designed to masterplan/outline planning level, with detailed design to follow, it is the Applicant's position that the LEAP could easily be accommodated at detailed design stage in another location without adversely affecting the quantum of development of either housing or public open space, including the LEAP provision within the site.

Eastern Boundary Planting

- 3.8.27 The Applicant does not consider that the Project would affect the robust nature of any planting along the eastern boundary of DHGV. Landscaping as proposed in the masterplan and approved via the planning application can be provided. Indeed, the Applicant is offering a replacement tree planting scheme and would be willing to discuss with the relevant Local Authorities and LIH as the landowner if, and if so what, additional planting could be provided in this location.
- 3.8.28 An important point to note in relation to the provision of such planting is that, given the approved phasing of DHGV, if planting is undertaken by the Applicant during construction of the overhead line, it will have many years to mature before any development is being constructed on DHGV in proximity to the overhead line.

Housing Need and Viability

- 3.8.29 The Applicant fully recognises the strategic importance of DHGV and has amended the overhead line alignment (to align with the existing gas pipeline) in order to reduce the potential for impacts on the development. The 2023 preferred draft alignment was amended to take forward the preference to follow the gas pipeline corridor for a greater distance in this location.
- 3.8.30 The concern raised by ECC and BBC relating to viability is intended to be supported by the Savills Report, and is that an impact on property prices and the Residential Gross Development Value (RGDV) might mean that less affordable housing would be provided and/or less infrastructure may be provided via the s106 obligation. The other infrastructure to be provided is generally of a fixed nature whereas the prevailing policy context, as is usual, allows the exact amount of affordable housing to be confirmed subject to viability. The Councils do not contend that the total quantum of housing will be affected.
- 3.8.31 Accordingly, the case being made against the Project, which is urgently needed energy infrastructure, provided critical national priority (CNP) by the NPSs, is essentially that it may reduce the affordable housing provision on DHGV.
- 3.8.32 That concern is not well founded, as explained below (and expanded upon in Appendix B), but even if it was, it is the Applicant's position that the residual harm alleged to flow from that impact is nowhere near to being sufficient to outweigh the public benefits of delivering the Project.
- 3.8.33 In this regard, the Applicant makes the following points.

Property or Land Value is Not a Material Consideration

- 3.8.34 A material consideration is a matter that should be taken into account in determining a planning application or on an appeal against a planning decision. However, the

relevant legislation does not define nor exhaustively list what may be regarded as a material consideration.

- 3.8.35 Matters that are generally considered material in the determination of planning applications include: overlooking/loss of privacy; overshadowing; parking; highway safety; traffic; noise; layout and density of building; design, appearance and materials; government policy; previous planning decisions (including appeal decisions); and other potential environmental effects, such as in relation to heritage, landscape and nature conservation.
- 3.8.36 It has however been held via the courts that planning is concerned with land use in the public interest, not private interests such that matters such as impact on property values and the loss of a view are not considered material in the determination of planning applications.
- 3.8.37 This position is also confirmed in Planning Practice Guidance Determining a planning application²² at paragraph 008.
- 3.8.38 Whilst the legal context for applications for Development Consent Orders (DCOs) is set by the Planning Act 2008, it requires such applications to be decided in accordance with any relevant NPS, except to the extent that specified exceptions apply, one such exception being if the adverse impact of the DCO development would outweigh its benefits. This is clearly not the case when considering any potential impact upon DHGV as the benefits of the Project would clearly outweigh any such effects.
- 3.8.39 NPSs are therefore the primary consideration for deciding applications for DCOs and none of the NPSs relevant to the Project, EN-1, EN-3 and EN-5, include any specific requirement to consider the effect of overhead lines and associated infrastructure on property values.
- 3.8.40 Accordingly, it is the Applicant's position that property values are not a material planning consideration for the purposes of determining this DCO application.

Assistance to the Examining Authority (ExA)

- 3.8.41 Notwithstanding the above, the Applicant recognises that, in making a decision on an application for a DCO, the Secretary of State (SoS) is required by Section 104 (2)(d) of the Planning Act 2008 to have regard to, inter alia; '*any other matters which the SoS thinks are both important and relevant to the decision*'.
- 3.8.42 The Applicant has also recognised that despite confirming that no Environmental Statement (ES) for a DCO application had previously devised a methodology for an assessment of property prices in the Scoping Report (**6.19 Scoping Report [APP-288 to APP-296]**), the PINS Scoping Opinion (**6.20 Scoping Opinion [APP-297]**), due to the Scoping Report not providing a detailed route or confirmation of likely receptors, did not consider there was, whether from overhead line development or any other form of development, sufficient information to rule out the potential for significant effects. Accordingly, the PINS Scoping Opinion requested an assessment of likely significant effects in this regard.
- 3.8.43 As such the submitted ES (at paragraphs 15.3.7 - 15.3.15) referenced the House Prices: Impact of Beaulieu-Denny Grid Infrastructure study²³ and confirmed that the overall conclusion of the study was that there was no discernible effect as a result of

²² Ministry of Housing, Communities and Local Government (2023) *Determining a planning application*

the operation of the Beaulieu Denny overhead line. The ES concluded that, although the facts will be different, no better information is available for the Project to draw on and therefore considered it reasonable to adopt the same conclusions for the Project

- 3.8.44 The ES also includes a socio-economic assessment on the effect on DHGV (**6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]**, Section 15.5) which confirms that, in Environmental Impact Assessment terms, no significant socio-economic effects are anticipated.
- 3.8.45 Since the concern in relation to property and land values in relation to DHGV continues to be raised in the LIRs, the Applicant decided to consider this matter on a theoretical basis, in order to assist the ExA.
- 3.8.46 Accordingly, a summary response to the Savills Report is provided below with further detail set out in Appendix B.

Response to Savills Report

- 3.8.47 The Applicant has appointed specialist advisors, CBRE, to review the Savills Report and the summary conclusions of the CBRE review are set out below:
- 3.8.48 The Savills approach to impact is incorrect because, having regard to The National Grid publication *National Grid Design Guidelines for Development Near Pylons and High Voltage Overhead Power Lines*, there is a very significant opportunity to mitigate to the extent that there might be no impact on quantum of development.
- 3.8.49 It is noted that the studies relied upon in the Savills Report relate to situations whereby overhead lines were introduced near to existing housing. However, the circumstance in relation to DHGV is the opposite of this as the overhead line will be in place when the houses on DHGV being constructed.
- 3.8.50 Savills seeks to rely on a report prepared by London School of Economics to sustain its view that property value is impacted. This approach ignores National Grid's experience which is that there is a trend towards the development of higher value properties in proximity to the lines because of the open aspect the OHL corridor provides and/or proximity to Public Open Space (POS) and that proper planning, design and mitigation reduces or removes any injurious effect.
- 3.8.51 The effect of the scheme will be reflected in the value paid by LIH in its recent purchase of the site. If any loss arises then it will be reflected in land value and for which there is a recourse to compensation
- 3.8.52 The DHGV development is predicated on the removal of the existing 132kV line the cost of which will be borne by the applicant and which, otherwise, is not reflected in the Savills calculation

Consideration of Impact

- 3.8.53 CBRE's advice is, therefore, that it does not consider that the Project will impact GDV to any meaningful significant extent, and certainly not enough to impact viability to the extent it will prevent deliverability. There is also no evidence provided by the Council's that the Project will impact the viability of DHGV, the LIRs do not say that the site will not be delivered and, importantly, the site owner, LIH, do not say that either and do not even raise the issue of viability in their Relevant Representation. Furthermore, any loss suffered will be suffered by the landowner (in land value) for which there is recourse to compensation.

- 3.8.54 CBRE also confirm that the ‘worst case scenario’ that Savills have been able to point to is a 3.7% impact on GDV, which, when compared with other ordinary economic factors that can affect land prices, is a very small impact and is typically accounted for within a contingency.
- 3.8.55 Specifically with regard to affordable housing provision, the Brentwood Local Plan²¹ (Part 3 of Policy HP05) recognises that where robust viability evidence demonstrates that the full amount of affordable housing cannot be delivered, the Council will negotiate a level of on-site affordable housing that can be delivered.
- 3.8.56 As such, the provision of 35% affordable housing is not fixed; it is a target that the Council wishes to aim for and is willing to reduce should scheme viability dictate.
- 3.8.57 At present there is no indication from the DHGV site owners that the 35% affordable housing target is not achievable. Therefore, hypothetically, even if this did end up being the case, provision of less affordable housing, justified in viability terms, is not contrary to policy and the benefits of the Project would justify it going ahead even if there were some minimal impact on the percentage of affordable housing provided, which at present is not supported by evidence.

Summary Conclusion

- 3.8.58 The evidence put forward does not make a case that the deliverability of DHGV will not occur. Furthermore, even if the ‘worst-case’ scenario put forward by Savills were to come to bear, the likely outcome of that hypothetical circumstance is that the proportion of affordable housing would be slightly reduced, the consequences of which is that a policy-compliant development at DHGV would still be achieved. This would, therefore, not constitute harm that would warrant the refusal of the Project, itself a CNP infrastructure project for which there is urgent need.
- 3.8.59 Similarly, the other matters raised relating to heritage sightlines and the position of a LEAP would not impact deliverability of DHGV and would certainly not have such an impact upon DHGV such that refusal of the Project is warranted given it is CNP infrastructure and the underlying need for the Project.
- 3.8.60 Finally, it is the Applicant’s position that the Project could contribute towards further planting along the eastern boundary of DHGV in direct response to the concern raised in the LIR in this respect.

3.9 Good Design

Local Authority Positions

- 3.9.1 Five Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 3.8 Good Design - Local Impact Report coverage

Local Authority	Paragraph(s) covering this topic
Norfolk County Council	11.30
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	13.32

Local Authority	Paragraph(s) covering this topic
Essex County Council	4.3.74 - 4.3.76, 4.3.79
Thurrock Council	N/A
South Norfolk District Council	N/A
Tendring District Council	7.5
Colchester City Council	N/A
Braintree District Council	N/A
Chelmsford City Council	8.521 - 8.524
Brentwood Borough Council	N/A

The Applicant's Position

Introduction

- 3.9.2 As set out in **7.15 Design and Access Statement [APP-353]** (DAS) the Applicant's position is that through the application of the Holford Rules²⁴ and Horlock Rules²⁵ and the undergrounding policy, we are able to demonstrate that the principles of good design have been applied in the design of the Project.
- 3.9.3 It is concluded in **7.15 DAS [APP-353]** and **7.16 Design Approach for Site Specific Infrastructure [APP-354]** (DASSI) that the Project satisfies the good design criteria identified within Overarching National Policy Statement (NPS) for Energy (EN-1) (2024) and NPS for Electricity Networks Infrastructure (EN-5) (2024). The DAS and DASSI both demonstrate how the Planning Inspectorate's Advice on Good Design²⁶ and National Infrastructure Commission Design Principles for National Infrastructure²⁷ have been given due regard during the development of the Project.
- 3.9.4 The Applicant notes the matters raised in LIRs regarding good design and has grouped them into a series of themes for the purposes of responding as follows:
- The extent to which EN-5 confirms good design allows for some effects to be acceptable and rationalising this with a perceived need to progress a Project with least effects
 - The need for, and role of a Design Champion and the geographical extent of their responsibilities
 - Approach to application of the Holford and Horlock Rules and the influence of the presence of homes, environmental features and other constraints on the design outcome.

²⁴ National Grid (n.d.) The Holford Rules

²⁵ National Grid (2006) The Horlock Rules

²⁶ Planning Inspectorate (2024) Nationally Significant Infrastructure Projects: Advice on Good Design

²⁷ National Infrastructure Commission (2020) Climate, People, Places, Value – Design Principles for National Infrastructure

- 3.9.5 We start our response by providing an overview of our approach to good design and the policy context for good design. We have limited the material in this section to that necessary to respond to the points raised with signposting to further detail should that be required.

Response: The Applicant's Approach to Achieving Good Design

- 3.9.6 Good design of electricity transmission infrastructure is achieved by application of the Holford and Horlock Rules, alongside an iterative design approach informed by stakeholder engagement, relevant sections of national policy (NPS EN-1 and EN-5) and the embedded environmental design mitigation as part of the Environmental Impact Assessment (EIA) process. Such good design principles are then intertwined with the technical design requirements alongside the regulatory and other constraints such as operational, safety and security requirements for new electricity transmission infrastructure.

- 3.9.7 NPS EN-1 and NPS EN-5 (both 2024) set out the requirement to deliver good design, and in developing the Project the Applicant has responded to the criteria by which it will be assessed, using the guidance of the Holford Rules and the Horlock Rules. **7.15 Design and Access Statement [APP-353]** sets out how the Project reflected the four principles of good design in the Planning Inspectorate's 'Advice on good design'.

- 3.9.8 The majority of the Applicant's infrastructure for the Project is located above ground. The key design objective was to ensure that this infrastructure was integrated successfully into its surroundings having regard to National Grid's statutory duties under the following:

- Electricity Act 1989:
 - Section 9(2) duties to develop and maintain an efficient, co-ordinated and economical system of electricity transmission
 - Section 38 and Schedule 9 duties to preserve natural beauty and mitigate environmental effects
- Industry-standard Holford Rules for overhead line routeing and Horlock Rules for substation siting
- The then-current policy framework (including the 2011 National Policy Statements EN-1 and EN-5) which was the relevant policy framework during the design stage of the Project
- NPS EN-1 (2024) and NPS EN-5 (2024) which are the policies relevant to the Project.

Policy Context for Good Design

- 3.9.9 Section 4.7 of NPS EN-1 (2024) states that good design should ensure functionality, sustainability, and aesthetic quality. Paragraph 4.7.1 is particularly relevant, stating that: *'The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object – be it a building or other type of infrastructure – including fitness for purpose and sustainability, is equally important.'*

- 3.9.10 Paragraph 4.7.2 of NPS EN-1 states: ‘Applying good design to energy projects should produce sustainable infrastructure sensitive to place ... efficient in the use of natural resources ... and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible’. The NPS EN-1 recognises (paragraph 4.7.6) that there may be limited choice in physical appearance of energy infrastructure, but there could be opportunities to demonstrate good design in terms of siting. It also suggests that functionality (fitness for purpose and sustainability) and aesthetics should be considered (paragraph 4.7.10).
- 3.9.11 NPS EN-5 expands on the above setting out at Paragraph 2.4.3 that ‘...*the Secretary of State should bear in mind that electricity networks infrastructure must in the first instance be safe and secure, and that the functional design constraints of safety and security may limit an applicant’s ability to influence the aesthetic appearance of that infrastructure.*’
- 3.9.12 NPS EN-5 makes it clear that the government considers overhead lines should be the ‘strong starting presumption for electricity networks developments in general’, although ‘this presumption is reversed when developments will cross part of a nationally designated landscape’ (paragraph 2.9.20). It is also noted that EN-5 identifies that there may also be instances outside the nationally designated landscapes, where ‘a high potential for widespread and significant adverse landscape and/or visual impacts’ (paragraph 2.9.24) may result in the use of underground cables in certain sections.
- 3.9.13 The Planning Inspectorate’s Advice on Good Design²⁸ was published in October 2024; whilst not part of legislation it gives advice that explains why good design is important, what success might look like and how it might be delivered in Nationally Significant Infrastructure Project applications. As such the Advice on Good Design is considered to be a relevant consideration in the determination of the application for development consent.
- 3.9.14 While the design development of the Project commenced prior to the publication of this guidance and was therefore not shaped by it from the outset, the **7.15 Design and Access Statement [APP-353]** utilises the principles with the Advice on Good Design and demonstrates how the evolving design nonetheless aligned with the principles and expectations set out in the advice note. This assessment ensures design can be understood in relation to the most current Planning Inspectorate advice on good design, adopting the four principles below.
- **Assemble:** Establish purpose, team, and baseline data
 - **Research:** Analyse constraints, alternatives, and stakeholder feedback
 - **Coordinate:** Refine design based on technical feasibility and consultation
 - **Secure:** Embed design commitments in the Development Consent Order and appoint a Design Champion to oversee post-consent design integrity.
- 3.9.15 An assessment of the Project’s design evolution against these principles is set out in **7.15 Design and Access Statement [APP-353]**.

²⁸ Planning Inspectorate (2024) Nationally Significant Infrastructure Projects: Advice on Good Design

- 3.9.16 Similarly to the Advice on Good Design, the Design Principles for National Infrastructure²⁹ have been given due regard during the development of the Project.

Response: The Project has correctly applied the guidance of the Holford and Horlock Rules

- 3.9.17 A number of the LIRs make reference to perceived incorrect applications of the Holford and Horlock Rules. This includes an inference that Holford Rule 7 would guide to undergrounding of the 400 kV connection through the Dunton Hills Garden Village or that the sequence of angle pylons at Ardleigh means that the EACN is incorrectly sited.
- 3.9.18 The Applicant's position is that in these example locations, as elsewhere, the consideration of the guidance in the Holford and Horlock Rules has been consistently applied with due regard to other relevant factors and respecting the flexibility inherently allowed for within the rules.
- 3.9.19 The Holford Rules provide broad principles for overhead transmission line routeing. They were formulated by the late Lord Holford and were reviewed by National Grid in 1992 and have become accepted within the electricity transmission industry as the guidelines for overhead transmission line routeing. Paragraph 2.9.16 of NPS EN-5 states that the Holford Rules should be embodied in applicant's proposals for new overhead lines.
- 3.9.20 Similarly, the Horlock Rules, devised by National Grid in 2006, provide guidelines for the siting and design of new substations, or substation extensions. They also concern the siting of CSE compounds and line entries. In summary, like the Holford Rules, they facilitate the consideration of environmental factors and amenity within the design and siting of new substation infrastructure. The Holford and Horlock Rules provide guidance on routeing and siting rather than strict rules to be adhered too. The approach of the Project to the consideration of the Holford and Horlock Rules is consistent with NPS-EN5 (2024) which requires applicants to embody the design principles where possible (paragraph 2.9.13).
- 3.9.21 In overview, the rules seek to reduce any adverse impacts associated with new overhead lines and substations through the adoption of a series of 'common sense' rules. The seven Holford Rules, their supplementary notes, and the Horlock Rules, are identified in Chapter 5 of **7.15 Design and Access Statement [APP-353]**. These inform the routeing and siting decisions by guiding them away from areas which are considered to be of the highest amenity value, and encouraging particular design outcomes by maintaining as direct and straight an alignment as possible. It is clear from the caveats within the wording of different rules, however, that balanced decision-making judgements are required on a case-by-case basis, informed by the unique circumstances of a location.
- 3.9.22 The guidance provided by the Rules has been applied throughout development of the Project. **7.18 2022 – Corridor and Preliminary Routeing and Siting Study [AP-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 and

²⁹ National Infrastructure Commission (2020) Climate, People, Places, Value – Design Principles for National Infrastructure

Horlock Rules informed the decision making process. We use the EIA process to inform the balance and define our proposals that we take forward, which are also informed by feedback. We would note that application of the rules typically involves balancing alternative solutions which can present conflicting 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. Throughout the routeing and siting, the application of the rules has required a careful balance of competing constraints.

- 3.9.23 In conclusion, in both examples of LIR feedback, as with others, a literal interpretation is being applied by the Local Planning Authorities without consideration of the caveats that are inherent to the guidance, which allow for deviation. At Ardleigh the presence of homes, road and rail infrastructure and waterbodies are just some of the features that influence the route and pylon positions. At Dunton Hills Garden Village it is the Applicant's position that there are opportunities to design around the infrastructure to reduce effects and that effects are inherently controllable.

Response: Good design should not be misrepresented by preference

- 3.9.24 The LIRs raise the potential for design change as a result of a preference. Examples include preferences for underground cabling, for repositioned CSEs, and for the use of T-pylons in certain locations. Whilst recognising the potential for such changes to reduce certain effects, they would also introduce their own effects and consequences. The Applicant's position is through the application of the Holford Rules and Horlock Rules and the undergrounding policy, we are able to demonstrate that the principles of good design have been applied in the design of the Project.
- 3.9.25 A standard lattice pylon is the starting point for any overhead line as guided by NPS EN5 (2024) and the consideration of the mitigation hierarchy. There are two locations where the Applicant is proposing to change to the low-height lattice design. These are: Little Waltham (sheets 3 and 4 of **2.3 Works Plans - Section F [APP-022]**) for heritage reasons and keeping heights below and out of the view of some gardens; and Thurrock, due to technical reasons for the Thurrock airfield where the change to low height pylons alongside existing 132 kV lattice pylons allows continued flying activity at Thurrock airfield (sheets 1 and 2 of **2.3 Works Plans - Section H [APP-024]**). It is noted that if there is a change in the use of the airfield (it is subject to an appeal against refusal of housing proposals) then a reversion to standard lattice pylons may occur, subject to timing.
- 3.9.26 T-Pylons are considered in locations where the mitigation hierarchy identifies that lattice pylons are unacceptable. The latest independent report on the Comparison of Electricity Transmission Technologies: Costs and Characteristics³⁰ 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

³⁰ Institute of Engineering and Technology (2025) Comparison of Electricity Transmission Technologies: Costs and Characteristics

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.

- 3.9.27 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.
- 3.9.28 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.
- 3.9.29 NPS 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.
- 3.9.30 In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it is not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea where the benefits clearly outweigh any extra economic, social or environmental impacts.
- 3.9.31 In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, at Great Horkesley having applied the EN-5 policies. Details are set out in **5.15 Design Development Report [APP-122]**, **5.6 Planning Statement [APP-085]** and **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]**.
- 3.9.32 The Project has therefore complied with the relevant EN-5 policies on undergrounding.

Response: The Project represents Good Design even though there are residual effects

- 3.9.33 The LIR from Tendring indicates that decision making on the siting of the EACN is incorrect because it does not favour an option that is perceived by the Local Planning Authority as having lower effects. The specifics of the EACN siting are addressed in Chapter 3 of this document (Alternatives – East Anglia Connection Node Substation Siting and Connection Routeing at Ardleigh section), but in principle it is also the

case that the Applicant is not required to take forward a scheme that minimises the effects.

3.9.34 Firstly, the effects are just one component of decision making and must be placed in the context of technical factors, socio-economic factors, costs and other material considerations. Secondly there is no requirement in either EIA or planning policy that requires all effects to be mitigated. The Applicant's approach to mitigation has been addressed in Chapter 2 - Overarching Policy Context of this document. The residual effects that remain following the application of the mitigation hierarchy, fall to the planning balance. As set out in **5.6 Planning Statement [APP-085]** it is the Applicant's position that the benefits of the Project outweigh its effects. Thirdly, the Project **qualifies as Critical National Priority (CNP) Infrastructure (also see Chapter 2), which means the residual effects are outweighed in the planning balance in 'all but the most exceptional cases'** - those exceptional circumstances being an unacceptable risk to defence, Habitats Regulations Assessment sites / irreplaceable habitats.

3.9.35 Taken together these confirm that the consent decision is made on the acceptability of the individual scheme and the balance of benefits and disbenefits it brings in the context of the relevant policy. The Project has been developed to be consistent with National Policy Statement EN-5 (2024) which is clear that the use of overhead lines is the strong starting presumption for the electricity networks development. At each stage of the Project a consistent level of information has been used to support decision making between alternatives leading to the selection of the preferred option. There is no requirement for all design variants or alternatives to be studied to the same level of detail captured within the Preliminary Environmental Information Report or Environmental Statement supported by a similar degree of detail from associated surveys. The Applicant does not consider it proportionate to complete such an extent of surveys, nor reasonable to impose such surveys on landowners when there can be shown, based on available data, to be no realistic prospect of an option progressing. The Applicant's position is that alternatives favoured by other parties do not meet the Project need case (see Chapter 2 Overarching Policy Context) and this is supported by NPS EN-1 paragraphs 4.3.22 to 4.3.24. The same position is taken by the Applicant at other locations.

Response: The need for and role of a Design Champion and the geographical extent of their responsibilities

3.9.36 The Applicant concurs with feedback from a number of the LIRs (for example Suffolk, Tendring, Essex) that the appointment of a Design Champion is beneficial. In **7.15 Design and Access Statement [Revision B]**, the Applicant has now fulfilled the requirement to appoint a Design Champion role. Given the current stage of the Project, this will consist of two complementary roles:

- Development Design Champion (DDC), formally appointed from the existing Project Design Team
- Delivery and Detail Design Champion (DDDC) from the Great Grid Partnership, who will be responsible for detailed design during the delivery phase.

3.9.37 Together, the DDC and DDDC will ensure design leadership and continuity across the full Project lifecycle. The appointment of a Design Champion is supported by NPS EN-1, National Infrastructure Commission Design Principles and the Planning Inspectorate Advice on Good Design. It should be noted that there is no requirement

for the role of a Design Champion to carry out a backcheck of various route alignment alternatives.

- 3.9.38 The Applicant does not agree, however, with the suggestion that the role of Design Champion, (and by extension, the role of the Applicant) should extend to an overarching role responsible for strategic masterplanning of energy infrastructure. The Applicant has no ability to control or impose development on third parties. Such co-ordination, in the view of the Applicant, would preferentially rest with the Local Planning Authorities serving as the determining authorities.

Conclusion

- 3.9.39 NPS EN-1 recognises that in discussing 'good design', the concept is more than simply a consideration of visual appearance.
- 3.9.40 Good design of electricity transmission infrastructure is primarily governed by application of the Holford and Horlock Rules, alongside an iterative design approach informed by stakeholder engagement, relevant sections of national policy (NPS EN-1 and EN-5) and the embedded environmental design mitigation as part of the EIA process.
- 3.9.41 Such good design principles are then intertwined with the technical design requirements alongside the regulatory and other constraints such as operational, safety and security requirements for new electricity transmission infrastructure. National Grid has developed its proposals in an iterative manner, considering local constraints or concerns and applying good design principles throughout. Other alternatives preferred by LIR contributors do not meet the same objective, in the Applicant's opinion. The appointment of the Design Champion will ensure that design leadership remains central to the implementation of the Project throughout all stages of its lifecycle.

3.10 Landscape and Visual - Landscape Compensation

Local Authority positions

- 3.10.1 All Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 3.9 Landscape and Visual - Landscape Compensation - Local Impact Report coverage

Local Authority	Paragraph(s) covering this topic
Norfolk County Council	4.2, 6.4, 6.22, 6.25, 11.2, 11.3, 11.6, 11.31, 11.32
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	13.3, 13.6, 13.27, 13.46, 13.159, 13.219, 13.222-13.229, Annexe B
Essex County Council	2.5.40, 4.4.67, 4.10.2, 4.10.4, 4.10.5, 4.10.6, 4.10.32, 4.10.39, 4.10.42, 4.10.43, 4.11.8,
Thurrock Council	6.2.1-6.2.3
South Norfolk District Council	3.1.9.4
Tendring District Council	17.2, 20.3

Local Authority	Paragraph(s) covering this topic
Colchester City Council	12.97, 12.103, 12.110, 12.116, 12.121, 12.126, 12.130, 12.140, 12.141
Braintree District Council	17.7.1
Chelmsford City Council	6.12, 8.302 -8.304. 8.379, 8.439 - 8.441, 8.544, 9.3, 9.13, 9.20 - 9.22, 11.11, 11.39, 11.40
Brentwood Borough Council	6.62, 10.8

The Applicant's Position

- 3.10.2 All the local authorities have raised comments within their LIRs in relation to landscape and visual compensation. Prior to addressing the matter of compensation, it is important to set the requests within context of the mitigation hierarchy and national policy.
- 3.10.3 The mitigation hierarchy has been systematically applied by the Applicant throughout the design of the Project in accordance with national policy. There has been an extensive and iterative process of routing and site selection with wide levels of public and stakeholder engagement as detailed in **5.1 Consultation Report [APP-066]**.
- 3.10.4 The mitigation hierarchy is a stepped process that helps development projects to address potentially adverse effects on the environment by showing how likely significant effects would be avoided, reduced, mitigated, and if possible compensated/offset. Prior to setting out the Applicant's approach to compensation, it is necessary to outline the Applicant's approach to the preceding elements of the mitigation hierarchy.
- 3.10.5 Further detail is provided within Chapter 2 – (Overarching Policy Context) of this document.

Mitigation hierarchy - landscape and visual

- 3.10.6 The Applicant has set out how the mitigation hierarchy has been applied to the Project in **6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-145]** and other application documents including the **Planning Statement [APP-085]**. The application of the mitigation hierarchy to the design evolution of the Project is also summarised in Chapter 2 – Overarching Policy Context of this document.
- 3.10.7 The Project has been designed as far as practicable to avoid, reduce and mitigate effects taking into consideration other constraints and National Grid's statutory duties. The route of the Project has sought to avoid centres of population, avoid or reduce impacts on important designated sites (where practicable) and be sensitively located within the landscape. This has been achieved through the choice of route corridor as set out in **7.18 2022 - Corridor Preliminary Routeing and Siting Study (CPRSS) [APP-356]** and through consideration of the Holford and Horlock Rules that have guided the final route alignment. The Applicant has also detailed in **7.20 2023 - Design Development Report for the Project [APP-358]**, **7.21 2024 - Design Development Report for the Project [APP-359]**, **7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360]** and **5.15 Design Development Report [APP-122]** design changes/variations which

have been considered following feedback received during consultations, explaining the process through which the changes/variants were considered and providing an explanation of the outcome of whether the change was included or not. The submitted alignment has been reached following careful consideration and balancing of environmental and socio-economic constraints and opportunities, engineering feasibility and cost, and planning policy.

- 3.10.8 The embedded mitigation forming part of the design of the Project in relation to landscape and visual has been summarised in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. Measures to reduce landscape and visual effects have included the use of underground cables in the areas of highest amenity value such as Dedham Vale National Landscape and its setting, and careful consideration of siting and routeing of infrastructure and pylons.
- 3.10.9 Standard mitigation measures have also been identified which would be implemented during construction to limit effects through adherence to good practices. As a general principle, all land which is temporarily impacted by the Project will be reinstated where practicable to its pre-construction condition and land use. The only exception to this will be restrictions on tree planting below the overhead line and directly on top of the underground cables. In addition to the reinstated habitats across the route, there will also be 'Environmental Areas' proposed at Norwich Main, East Anglia Connection Node and Tilbury North Substations and the Cable Sealing End (CSE) compounds. These multi-functional areas have been prioritised to provide mitigation or enhancements for different environmental aspects, i.e., sites where landscape and visual mitigation and biodiversity gains could be achieved together.
- 3.10.10 Following the implementation of the embedded and standard mitigation, **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** identifies significant adverse residual effects during operation on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. The effects reduce to not significant levels beyond this.

Adequacy of landscape and visual mitigation provided

- 3.10.11 A number of local authorities have raised in their LIRs that they consider the Project should provide further landscape and visual mitigation. There has also been a request from South Norfolk District Council in their LIR for the Applicant to provide further assessment or mitigation proposals to demonstrate how the landscape impacts can be reduced, avoided or better managed. It is however considered that through Project design it has been shown how changes have been made in line with the mitigation hierarchy, with proportionate embedded and standard mitigation detailed and secured within the application.
- 3.10.12 Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of NPS EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. This has been reflected in some LIRs, where Thurrock Council, Tendring District Council, Essex County Council, Chelmsford City Council, Colchester City Council and Braintree District Council, either highlight that the scale and height of the infrastructure limits the scope for full mitigation or acknowledged that it is not practicable or possible to fully mitigate the effects due to the scale of the works and height of the pylons.

- 3.10.13 NPS EN-5 (2024) paragraph 2.9.11 is also explicit that mitigation is not expected to result in the removal of landscape and visual effects for overhead lines '*and the impossibility of full mitigation in these cases does not countermand the need for overhead lines*'.
- 3.10.14 The acknowledgement in the LIRs that full mitigation may not be possible has led to the request for compensation.

Compensation and enhancement / furtherance measures proposed

- 3.10.15 Compensatory measures have been considered as part of the development of the Project in relation to the mitigation hierarchy but the NPS policy framework in relation to the mitigation hierarchy does not require that all residual effects are avoided, reduced, mitigated or compensated.
- 3.10.16 Whilst there is currently no legal obligation for BNG on NSIPs, the Applicant's approach to BNG has been to meet the policy requirements within the national policy statements, deliver its corporate commitments of at least 10% BNG with wider benefits, maximise the benefits and value from consumer-funded BNG and to follow the spirit of the Town and Country Planning Act 1990 BNG legislation and guidance including using the Statutory Biodiversity Metric. Further details of the approach taken is set out in the Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain section in this Chapter of this document, and in **7.1 Biodiversity Net Gain Report [APP-299]**.
- 3.10.17 The Applicant has also committed to a 3:1 replacement ratio for individual trees; and all other tree habitats including scrub and woodland (area habitats) are assessed and mitigated through the BNG metric and captured in **7.1 Biodiversity Net Gain Report [APP-299]**. While every effort has been made to deliver the Project's BNG commitment on-site through replacement planting and on-site mitigation in the form of habitat creation and enhancement, given the scale and nature of the Project, this 10% net gain is not fully achievable on-site within the Order Limits. Off-site biodiversity units are therefore proposed to make up this deficit. In particular, discussions are currently taking place with the Waveney and Little Ouse Recovery (WaLOR) project, a landscape recovery scheme which is located in the same geographical area as the Project. The Applicant has been discussing the opportunity to acquire up to approximately 600 biodiversity units from the scheme.
- 3.10.18 The reinstatement planting, tree planting and BNG provisions are all secured through **7.4 Outline Landscape and Ecological Management Plan [Revision C]**, which is subject to a requirement in **3.1 Draft Development Consent Order [APP-056]** requiring approval from the local planning authorities. The off-site delivery of BNG and any off-site tree planting required as a result of the 3:1 replanting ratio will be secured by a legal agreement.
- 3.10.19 Consideration has been given to the duty to seek to further the purposes of the Dedham Vale National landscape. In addition to the embedded mitigation including commitment to underground the cables through the National Landscape and its setting, additional measures include a Dedham Vale National Landscape Fund and a commitment to undertake an initial feasibility study considering the future removal of an existing 132 kV overhead power line. Further details on the approach to the duty is set out in the Landscape and Visual - Furthering the Purposes of the National Landscape section in this document, and in **5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]**.

- 3.10.20 The above commitments provide an appropriate package of compensation and enhancement/furtherance measures to be delivered by the Project.

Request for further landscape and visual compensation

- 3.10.21 A number of local authorities have raised in their LIRs that they consider the Project should, in addition to providing greater mitigation, offset the residual adverse landscape and visual effects identified within the Environmental Statement, with compensatory measures. In the majority of cases limited detail has been provided in relation to the specific nature of the compensatory measures requested, the Applicant's response to the need for further compensation is however outlined below and reflects the Applicant's responses to Relevant Representations on this issue.
- 3.10.22 As stated above, the NPS policy framework in relation to the mitigation hierarchy does not require that all residual effects are avoided, reduced, mitigated or compensated. 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 (2024) and EN-5 (2024) policy framework, including the further critical national priority presumption in section 4.2 of EN-1 (2024).
- 3.10.23 Whilst compensation is part of the mitigation hierarchy, EN-1 (2024) or 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. Revised EN-1 (2026) paragraph 4.2.25 also confirms that compensation, by definition, does not reduce an adverse effect resulting from a development.
- 3.10.24 It is particularly noteworthy that none of the policies on landscape and visual effects in EN-1 (2024) or EN-5 (2024) expressly mention compensation. This is in contrast to text on biodiversity in particular and offshore wind, for example, the following paragraphs in EN-1 (2024):
- '5.4.6 The British Energy Security Strategy¹⁸² committed to establishing strategic compensation for offshore renewables NSIPs, to offset environmental effects but also to reduce delays for individual projects. See paragraphs 2.8.276 – 2.8.283 of EN-3 for further information.'*
- 3.10.25 Or, for example, under the heading of Biodiversity and Geological Conservation, NPS EN-1 (2024) states (our emphasis):
- '5.4.35 Applicants should include appropriate avoidance, mitigation, **compensation** and enhancement measures as an integral part of the proposed development.'*
- '5.4.42 As a general principle, and subject to the specific policies below, development should, in line with the mitigation hierarchy, aim to avoid **significant harm to biodiversity and geological conservation interests**, including through consideration of reasonable alternatives (as set out in Section 4.3 above). **Where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought.**'*
- 3.10.26 The above policy context for biodiversity is not present in the same way for landscape and visual impacts. None of the policies above on landscape and visual effects in EN-1 (2024) or EN-5 (2024) state that residual impacts are required to be compensated if they cannot be mitigated in the way they do for biodiversity.

- 3.10.27 The NPS position in relation to compensation (as set out above) is also consistent with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations).
- 3.10.28 The EIA Regulations state in Article 14(2)(c) that an Environmental Statement must include: *‘a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment’*. The important points here being that:
- h) the Environmental Statement must include a description of measures envisaged, but not that this must result in all significant effects being mitigated or offset
 - i) The words *‘if possible’* are inserted before the word *‘offset’*. The EIA Regulations therefore do not treat offsetting (or the similar word ‘compensation’) in the same way as prevention or reduction.
- 3.10.29 The Environmental Statement is fully compliant with the EIA Regulations; it clearly sets out measures incorporated to avoid, prevent, reduce and, if possible, offset likely significant effects.
- 3.10.30 The above aligns with The Bramford to Twinstead Development Consent Order, 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.
- 3.10.31 The commitments already made by the Applicant in relation to BNG, measures proposed to seek to further the purpose of the National Landscape and the 3:1 replanting ratio for individual trees are considered to provide an appropriate package of compensation and enhancement measures to be delivered by the Project. Please also refer to the Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain section in Chapter 3 of this document for more consideration of BNG.

WaLOR project and specific compensation request

- 3.10.32 It is noted that Suffolk County Council in Annex B to their LIR and Norfolk County Council in their LIR have requested a specific package of compensatory measures which would provide funding for the WaLOR project. The Applicant’s position in relation to the policy position regarding landscape compensation is set out above. It is however recognised, just as the delivery of the Environmental Areas within the Order Limits are multi-functional areas providing ecological and landscape compensation, the Applicant’s approach to offsite BNG could also deliver greater additional benefits more than purely ecological benefits. It is anticipated that securing biodiversity units from the WaLOR project would yield wider multi purpose environmental benefits in line with the local authorities’ request. See the Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain section in Chapter 3 of this document that confirms the additional environmental and societal value will be reported through the final iteration of the Biodiversity Net Gain Report, delivered post consent.

Policy compliance of the project without further compensation

- 3.10.33 The Applicant has set out in this section on landscape compensation and within Chapter 2 – Overarching Policy Context of this document, the reasons why further landscape and visual compensation is not considered to be required. It is noted that in the LIRs there has been a different interpretation of national policy in relation to the

need to provide further landscape and visual compensation. The Applicant however maintains the position set out within this document and previously set out in responses to Relevant Representations and **5.6 Planning Statement [APP-085]**.

- 3.10.34 This policy interpretation has been taken further within some LIRs which state that development consent for the Project should not be granted without a substantial landscape and visual compensation scheme due to the perceived conflict with NPS EN-1 (2024) and significant landscape and residual effects identified within the Environmental Statement.
- 3.10.35 The Applicant has applied the mitigation hierarchy as detailed in the **6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-145]** and other application documents including **5.6 Planning Statement [APP-085]** and proposed an appropriate and sufficient package of mitigation, compensation and enhancement measures to be delivered by the Project.
- 3.10.36 The Applicant has set out within Chapter 2 – Overarching Policy Context of this document how NPS EN-1 (2024) states the application and the residual effects should be considered by the Secretary of State, which includes the presumption set out in paragraph 4.1.3 of NPS EN-1 (2024) acknowledging the level of urgency and need for this infrastructure, and the further additional presumption applicable to critical national priority infrastructure in paragraphs 4.1.7.

3.11 Landscape and Visual - Furthering the Purposes of the National Landscape

Local Authority Positions

- 3.11.1 Two Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 3.10 Landscape and Visual - Furthering the Purposes of the National Landscape - Local Impact Report coverage

Local Authority	Paragraph(s) covering this topic
Norfolk County Council	N/A
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	13.230
Essex County Council	N/A
Thurrock Council	N/A
South Norfolk District Council	N/A
Tendring District Council	N/A
Colchester City Council	12.165
Braintree District Council	N/A
Chelmsford City Council	N/A
Brentwood Borough Council	N/A

The Applicant's Position

- 3.11.2 The Applicant recognises its duty to seek to further the purposes of the Dedham Vale National Landscape. The Applicant has met its duty within its design through the provision of underground cabling through the protected landscape and adjacent land, sensitive siting and routeing, and use of trenchless crossing techniques in specific locations. Further measures, that will be secured by legal agreement, have been developed in conjunction with the National Landscape Partnership and local authorities which include a financial contribution in the form of the Dedham Vale National Landscape Fund and a commitment to undertake an initial feasibility exercise of the future removal of an existing 132 kV overhead line.
- 3.11.3 The Applicant welcomes the comments contained within the joint Local Impact Report from Suffolk County Council, Babergh District Council and Mid Suffolk District Council [REP1-178] and looks forward to continued engagement on this matter. The Applicant notes that Colchester City Council may wish to provide comment in the future.

Legal and policy context

- 3.11.4 Section 245 of the Levelling-up and Regeneration Act 2023 and section 85(1) of the Countryside and Rights of Way Act 2000 (CRoW) places a duty on relevant authorities to seek to further the statutory purpose of Protected Landscapes. The legal duty is also reflected within the Overarching National Policy Statement for Energy (EN-1) (2024) in paragraph 5.10.7 which provides guidance on the nature of measures, *'For development proposals located within designated landscapes the Secretary of State should be satisfied that measures which seek to further purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development'*. Paragraph 5.10.8 also makes it clear *'The duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them'*.
- 3.11.5 The duty does not prevent the granting of consent for development which results in harm to the natural beauty of a protected landscape, nor does it seek to change the manner in which applications are weighed up and considered by the decision maker, rather the duty requires certain additional matters to be considered during decision making. The guidance for relevant authorities on seeking to further the purposes of Protected Landscapes published by the Department for Environment, Food and Rural Affairs (Defra) in December 2024³¹ in addition to policy and case law, has been carefully considered and informed the approach taken to the seek to further duty by the Applicant.

Approach to duty

- 3.11.6 The approach taken by the Applicant and measures utilised have been 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]**, submitted with the development consent application.

³¹ Department for Environment, Food and Rural Affairs (2024) *Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes* - <https://www.gov.uk/government/publications/the-protected-landscapes-duty/guidance-for-relevant-authorities-on-seeking-to-further-the-purposes-of-protected-landscapes>

- 3.11.7 Whilst the strengthened duty did not come into force until December 2023, which was after the Project had undertaken the **7.18 2022 - Corridor and Preliminary Routeing and Siting Study (CPRSS) [APP-356]** and two non-statutory consultations, the introduction of the duty would not have, and did not, affect the conclusions set out in the **5.15 Design Development Report [APP-122]** and **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**. The National Landscape was a fundamental consideration throughout the design development process. The design changes made following consultations in relation to the National Landscape are set out in the **7.20 2023 - Design Development Report for the Project [APP-358]**, **7.21 2024 - Design Development Report for the Project [APP-359]** and **5.15 Design Development Report [APP-122]**.
- 3.11.8 The Applicant has avoided locating the Cable Sealing End compounds and the East Anglia Connection Node (EACN) Substation inside the Dedham Vale National Landscape and further minimised effects through sensitive siting of these aspects of development to avoid significant effects within its setting. The electricity connection in the National Landscape is an underground cable, meeting the requirements of the National Policy Statement for Electricity Networks Infrastructure (EN-5) (2024) by applying the presumption that connections within a National Landscape should be located underground.
- 3.11.9 The approach to careful routeing and siting to identify the proposed alignment and using underground cable technology through the National Landscape and within the setting, demonstrates how the Project has sought to meet the duty, minimising effects on the designated landscape while maintaining compliance with National Grid's statutory duties under the Electricity Act 1989 to be economic and efficient and meet the strategic network reinforcement need.
- 3.11.10 The mitigation hierarchy has been applied during the iterative design process to reduce the adverse effects of the Project on the Protected Landscape and its setting as far as practicable. Specific measures have been embedded into the design of the Project in addition to standard mitigation measures comprising management activities and techniques to limit effects through adherence to good site practices. Whilst significant residual effects remain during construction following the application of embedded and standard mitigation set out in Section 13.6 of **6.13 Environmental Statement Chapter 13 – Landscape and Visual [APP-226]** and Sections 5.3 and 5.4 of **5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]**, the Applicant has committed to provide additional measures to seek to further the purposes of the Dedham Vale National Landscape.
- 3.11.11 In addition to taking the National Landscape into consideration through all stages of the Project design, in line with the Defra guidance additional '*appropriate, reasonable and proportionate steps*' are proposed in respect of the duty to seek to further the statutory purpose of the National Landscape. The additional measures have been identified in collaboration with the National Landscape Partnership and following engagement with the relevant Local Authorities. The additional measures include:
- A financial contribution in the form of the Dedham Vale National Landscape Fund
 - Undertaking/commissioning a piece of work to look at the feasibility of the future removal of an existing UK Power Networks 132 kV overhead line (known as the PJ Line).

- 3.11.12 The Dedham Vale National Landscape Fund will be utilised by the National Landscape Partnership to deliver benefits and provide enhancements to further the statutory purpose of the National Landscape. A potential list of projects has been created and provided within Annex A of **5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]**.
- 3.11.13 The measures will be secured by legal agreement, the Heads of Terms for which are being finalised between the Applicant, the National Landscape Partnership and Suffolk County Council. The Applicant anticipates that the Heads of Terms will be agreed shortly, with a signed agreement prior to the end of the Examination.
- 3.11.14 The Applicant considers the approach taken to the Project and measures identified meet the requirements of section 85(1) of the CRoW Act, and are appropriate, reasonable and proportionate in accordance with NPS EN-1 (2024) and the Defra guidance.

3.12 Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting

Local Authority Positions

- 3.12.1 All Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 3.11 Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting - Local Impact Report coverage

Local Authority	Paragraph(s) covering this topic
Norfolk County Council	6.4, 6.22, 6.25, 11.23
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	13.133, 13.178, 13.172, 13.221, 13.227, 3.228, 13.229
Essex County Council	2.5.40, 4.10.41, 4.11.13, 5.7.30, 6.22.3
Thurrock Council	Appendix A
South Norfolk District Council	8.2.5, 10.2.2
Tendring District Council	20.12
Colchester City Council	7.54, 12.98, 12.102
Braintree District Council	9.7.1, 9.7.2
Chelmsford City Council	8.126, 8.145, 8.442, 8.443, 9.23 - 9.26, 11.21, 11.40
Brentwood Borough Council	6.62, 6.63, 6.65

The Applicant's Position

- 3.12.2 The Applicant has committed to an extensive replanting scheme for tree loss as a result of the Project. Three trees will be planted to replace each individual tree lost, and any loss of larger groups of trees and woodlands will be accounted for in the

Project's plans for Biodiversity Net Gain (BNG). Separately, the Applicant has provided a strategy for ancient woodland and veteran trees within **7.4 Outline Landscape and Ecological and Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]**. Full details of the compensatory measures for veteran trees are to be agreed post consent.

Approach to replacement tree planting

- 3.12.3 Overarching National Policy Statement for Energy (NPS EN-1) (2024) in section 5.11 on Land Use, including Open Space, Green Infrastructure and Green Belt, paragraph 5.11.27 identifies potential mitigation measures for tree loss, but importantly confirms that where woodland loss is unavoidable, compensation schemes will be required and then refers to securing the management of the newly planted trees. NPS EN-1 (2024) paragraph 5.4.32 relates to irreplaceable habitats (ancient woodland, ancient trees and veteran trees) and requires applicants to include measures to fully mitigate direct and indirect effects of development on these habitats. Paragraph 5.4.53 requires there to be exceptional reasons for the loss and suitable compensation strategies to exist.
- 3.12.4 Whilst during the iterative design process the Project has sought to minimise tree removal as far as practicable and to retain existing trees and woodlands wherever possible in accordance with paragraph 5.11.27 of NPS EN-1 (2024), tree loss will however result. **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]** identifies all trees which have the potential to be affected (this includes the assessment categories Removed, Affected Managed and Potentially Affected) by the Project; assesses the preliminary impact of the Project on those trees; and recommends protection measures as necessary.
- 3.12.5 The Applicant has made the commitment to 3:1 replacement planting for individual trees and small groups of individual trees within **7.4 Outline Landscape and Ecological Management Plan [Revision C]** which is secured by Requirement 4 within **3.1 Draft Development Consent Order [APP-056]**. The Applicant notes that this commitment has been welcomed within the LIRs.
- 3.12.6 All other tree habitat including scrub and woodland (area habitats) are assessed and mitigated through the BNG metric and captured in **7.1 Biodiversity Net Gain Report [APP-299]**. While every effort has been made to deliver the commitment to 10% BNG through replacement planting and habitat creation/enhancement on site within the Order Limits, this commitment is not fully achievable on-site and therefore the deficit will be delivered through off-site habitat creation. Further details on the BNG commitment is provided within the Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain section in Chapter 3 of this document.
- 3.12.7 Full details of on-site tree planting will be provided in accordance with the final Landscape and Ecological Management Plan (LEMP) (if provided within Environmental Areas) or the Reinstatement Planting Plan(s) secured under a separate requirement of **3.1 Draft Development Consent Order [APP-056]**. The Project will prioritise the replanting for individual trees within the Order Limits, however, off-site (outside the Order Limits) provision is likely to be required. **7.4 Outline Landscape and Ecological Management Plan [Revision C]** commits to replacement on-site tree planting commencing at the earliest suitable time of year following the completion of works for each relevant stage. Tree planting will where practicable be replanted in, or as close to, the same location from which they were removed. Exceptions to this include areas which are unsuitable (i.e. underneath

overhead lines, above underground cables, where there are existing constraints). Underneath overhead lines or above underground cables, low height and shallow routed scrub species will be included as alternative planting.

- 3.12.8 Where practicable, removed woodland and individual trees will be replaced on-site with the same species or another locally appropriate species. Consideration will be made to ecological enhancement of these areas, with a more diverse mix of native species planting. These trees will be sourced from British provenance stock to minimise the spread of pests and diseases. Mature trees will be replaced with a mix of trees which will match the existing species composition and planting density. It is not likely to be possible to replant all the trees lost as a result of the Project, on-site within the Order Limits, due to the constraints outlined above regarding planting under overhead lines and above underground cables.
- 3.12.9 Any off-site tree planting required as a result of the 3:1 commitment will be secured via a legal agreement. Off-site planting will be delivered through collaboration with landowners and/or third parties. An Off-site Planting Delivery Scheme will be provided to the relevant local authorities post consent for their information; this will provide details of the off-site provision. The Off-site Planting Delivery Scheme will: identify the requirement for off-site tree replacement planting; identify (where appropriate) the location of off-site tree replacement planting (or provide details of the organisation which shall deliver the off-site replacement trees to be funded by the Applicant); and identify the proposed timing for delivery of the planting.
- 3.12.10 The Applicant has prepared and shared with the local authorities, Heads of Terms regarding a unilateral undertaking ('UU') to be given by National Grid to the Local Planning Authorities along the Project route under section 106 of the Town and Country Planning Act 1990 ('s.106 UU'), relating to obligations designed to secure off-site planting required as a result of the 3:1 replanting commitment. A s.106 UU is seen as the most appropriate option to legally secure the Applicant's commitment to delivering the off-site planting, as it allows greater flexibility to draft detailed obligations and secures strong enforcements for the benefit of the local planning authorities receiving the s.106 UU. It is not considered that a bilateral agreement or a requirement is necessary. Engagement with the local authorities on this matter is continuing.

Compensatory planting for ancient woodland and veteran trees

- 3.12.11 Some local authorities have raised concerns in their LIRs in relation to the impacts on ancient woodland and veteran trees and commented on the need for compensatory planting or raised concern that this may not be deliverable.
- 3.12.12 **7.4 Outline Landscape and Ecological and Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]** provides a comprehensive explanation of the Applicant's approach to ancient woodland avoidance and minimisation of impacts. With mitigation measures proposed, it is concluded that there will be no significant long-term residual effects on ancient woodland as a result of the Project.
- 3.12.13 In relation to veteran trees, four trees are identified as requiring removal; **7.4 Outline Landscape and Ecological and Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]** identifies potential mitigation and compensation measures. The final veteran tree mitigation measures, remediation works and long-term monitoring are to be agreed at detailed design stage with the Project arboriculturist and the relevant landowners on a case-by-case basis. This

detail will be contained within the final strategy provided with the final LEMP. All management options discussed for veteran trees need to be deliverable and therefore will need landowner consent. The final LEMP will be subject to approval by the relevant planning authorities under Requirement 4 of **3.1 Draft Development Consent Order [APP-056]**.

3.12.14 **7.2 Code of Construction Practice [Revision B]** includes commitments to seek to retain trees as far as practicable, a commitment which will be adhered to during detailed design and construction of the Project.

3.12.15 The mitigation and potential compensatory measures proposed within the strategy are considered appropriate and proportionate.

Alternative form of calculating compensation for tree loss

3.12.16 There has been reference in the LIRs to the use of Capital Asset Value for Amenity Trees in assessing the losses and informing the compensatory replanting ratio for trees. It is also noted that in other LIRs, for example Colchester City Council's there is a request for canopy-based accounting.

3.12.17 Due to the scale of the Project and its interaction with so many different local authorities and therefore Local Plans, it would not be reasonable or practicable to propose a compensation strategy for tree loss which adhered to local policy in each area. The Applicant has therefore made a commitment in relation to compensatory planting involving a 3:1 commitment for individual trees with mitigation for large groups and woodlands being considered in **7.1 Biodiversity Net Gain Report [APP-299]**. This is considered appropriate and proportionate compensation for the tree loss.

3.12.18 The potential compensatory measures for veteran trees have been detailed within **7.4 Outline Landscape and Ecological and Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]** with final details to be identified within the final LEMP.

3.12.19 Tree canopy loss has been reported as per the sections of the scheme with no specifics for individual local authority boundaries. Section 8.2.3 of **7.4 Outline Landscape and Ecological Management Plan [Revision C]** confirms that following detailed design and prior to construction, relevant surveys would be undertaken to seek to reduce removal of trees/hedgerows.

Whether 3:1 planting commitment comprises compensation

3.12.20 A number of local authorities have commented in their LIRs that the 3:1 commitment is not compensation but comprises reinstatement planting. The Applicant considers that the delivery of on-site (within the Order Limits) reinstatement planting comprises reinstatement/mitigation, but the delivery of off-site (outside the Order Limits) planting under the 3:1 commitment would comprise compensation. The off-site planting does not reduce the adverse residual effects of the Project; it is a compensatory measure (off-set) which should be considered as part of the planning balance. Chapter 2 (Overarching Policy Context) of this document provides further details in relation to applicable national policy and the balancing exercise to be undertaken in relation to the Project.

Aftercare period for planting and planting failure rate

- 3.12.21 The adequacy of the length of the aftercare period for reinstatement planting has also been highlighted within LIRs. A commitment to a five-year monitoring/management of all hedgerow/tree planting on-site, with a commitment to maintaining the habitats in the Environmental Areas for a period of up to 30 years, has been included in **7.4 Outline Landscape and Ecological and Management Plan [Revision C]**. Comments have also been made in the LIRs on this point in relation to BNG, therefore a response is also provided within the Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain section in Chapter 3 of this document.
- 3.12.22 The five-year monitoring period for replacement planting (outside the Environmental Areas) is considered sufficient to ensure successful plant establishment. **7.4 Outline Landscape and Ecological Management Plan [Revision C]** states the planting will be undertaken by suitably experienced contractors in line with British Standards and follow general best practice principles outlined in Section 9.2 of **7.4 Outline Landscape and Ecological and Management Plan [Revision C]**. For example, Section 11.2 of BS 8545:2014³² states '*Post-planting management and maintenance is important if longevity in the landscape is to be achieved. A full young tree management programme with budgetary provision should be in place for all planting schemes. This management programme should be in place for at least 5 years.*' The Applicant's commitment to a five-year aftercare period adheres to the recommendation set out in the British Standard.
- 3.12.23 **7.4 Outline Landscape and Ecological Management Plan [Revision C]** also further commits to the aftercare being adaptive, allowing adaptations to be made in light of monitoring results. The five-year aftercare commitment is also in line with other previously consented National Grid Nationally Significant Infrastructure Projects such as The National Grid (Bramford to Twinstead Reinforcement) Order 2024 and The National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.
- 3.12.24 The comments within Essex County Council's LIR regarding the measures for establishment for new trees which can boost their survival rates, will be considered. Further details of the measures to be adopted in relation to tree planting will be provided within the final LEMP. It is not considered that an extended aftercare period is necessary.
- 3.12.25 There have also been requests for a planting failure rate to be applied. Requirement 9(7) (reinstatement planting plan) of **3.1 Draft Development Consent Order [APP-056]** secures the replacement of any trees or hedgerows planted as part of an approved reinstatement planting plan that, within a period of five years after planting, are removed, die or become seriously damaged or diseased. It is therefore not considered that an additional failure rate should be required.

The Applicant has committed to an extensive tree replanting scheme, full details of which will be provided in accordance with the final LEMP or Reinstatement Planting Plan(s) secured under requirements within **3.1 Draft Development Consent Order [APP-056]** with off-site delivery secured by legal agreement. The details of any offsite provision will be contained within an Off-site Planting Delivery Scheme provided to the local authorities post consent. The mitigation and compensatory measures identified for tree loss are appropriate, proportionate and in accordance with national policy.

3.12.26

³² British Standards Institution (2014) BS 8545:2014 Trees: from nursery to independence in the landscape

3.13 Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain

Local Authority Positions

- 3.13.1 All Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 3.12 Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain - Local Impact Report coverage

Local Authority	Paragraph(s) covering this topic
Norfolk County Council	6.4, 6.25, 6.26, 11.4
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	9.6, 9.7, 9.41, 9.43, 9.47, 9.58
Essex County Council	4.11.4, 4.11.8, 4.11.10, 4.11.13, 4.12.23, 5.7.29, 5.7.42-5.7.48, 6.17.2, 6.22.2
Thurrock Council	6.3.16
South Norfolk District Council	8.4.1
Tendring District Council	20.16, 20.17, 20.20
Colchester City Council	7.32, 7.38, 7.52, 7.72, 7.76, 7.78
Braintree District Council	8.4.14, 8.7.1, 8.7.2
Chelmsford City Council	8.116, 8.117, 8.121, 8.122, 8.442, 10.16, 11.40
Brentwood Borough Council	6.39, 6.42, 9.8

The Applicant's Position

- 3.13.2 The Applicant will deliver at least 10% Biodiversity Net Gain (BNG) for the Project. We will first seek to deliver on-site within the Order Limits, with required off-site BNG delivered within the county boundaries it passes and locally where practicable. On-site measures will be secured through **7.4 Outline Landscape and Ecological Management Plan [Revision C]** and Requirement 4 of **3.1 Draft Development Consent Order [APP-056]**, with off-site measures secured by legal agreement. Natural England is in agreement with the approach taken by the Project which is reflected in **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]**.
- 3.13.3 All the local authorities that have submitted LIRs have made comments regarding the Applicant's BNG strategy, which have been either addressed below or within Chapter 4 (Planning Policy and Environmental Topics) of this document.

Approach to BNG

- 3.13.4 The Environment Act 2021 introduces a mandatory requirement for 10% BNG for new developments, to ensure that they enhance biodiversity and create new green spaces for local communities to enjoy. Although BNG is a legal obligation for new

developments consented under the Town and Country Planning Act 1990 (TCPA) in England, the provisions in Schedule 15 of the Environment Act 2021 to make at least 10% BNG a legal obligation for Nationally Significant Infrastructure Projects (NSIPs) is not yet in force. Therefore, there is no mandatory requirement for BNG for NSIPs granted development consented under the Planning Act 2008. These are anticipated to be introduced for NSIPs where the application is accepted post May 2026.

- 3.13.5 National Grid's RIIO-T2 Business Plan (2021 – 2026) included a commitment to deliver 10% BNG with wider environmental and societal benefits on its construction projects. National Grid made these commitments three years in advance of formal legislation.
- 3.13.6 Whilst there is currently no legal obligation for BNG on NSIPs, National Grid's approach to BNG for NSIPs has been to meet the policy requirements within the national policy statements, deliver its corporate commitments of at least 10% BNG with wider benefits, maximise the benefits and value from consumer-funded BNG and to follow the spirit of the TCPA BNG legislation and guidance including using the Statutory Biodiversity Metric. **7.1 Biodiversity Net Gain Report [APP-299]** clearly sets out the Applicant's overall approach to BNG, the assessment methodology used and the mitigation and enhancement proposed in the absence of BNG guidelines for NSIPs. This approach was broadly agreed in principle with Natural England as shown by the agreement on BNG in the **5.9.13 Draft Statement of Common Ground – Natural England [REP1-035]**.
- 3.13.7 Within the Order Limits, areas of land (defined as Environmental Areas) are proposed around the Project's permanent assets, where there is sufficient space. Outline landscape plans have been developed for these Environmental Areas as part of **7.4 Outline Landscape and Ecological Management Plan [Revision C]**. The outline plans identify individual landscape mitigation proposals for the Environmental Areas. Ecologically, the Environmental Areas also provide habitat mitigation for the permanent impact of the associated substations and Cable Sealing End (CSE) compounds, with habitats of greater ecological value than that being lost, being created and existing habitats managed to a better condition in the long term. Through careful landscape design, these habitats have been created to also provide green corridors to ensure connectivity with the wider ecological network.
- 3.13.8 Post-consent, the baseline habitat information would be updated, and the Project would be subject to detailed design. The BNG metric would be re-run with the updated baseline and refined impact assessment in line with the approach already set out within **7.1 Biodiversity Net Gain Report [APP-299]**. The final Landscape and Ecological Management Plan will include detailed designs, details of the Environmental Area habitat creation, enhancement measures, ongoing management requirements, monitoring programme and responsibilities. The final Landscape and Ecological Management Plan is secured by Requirement 4 of the **3.1 Draft Development Consent Order [APP-056]** which must be approved by the Local Planning Authority.
- 3.13.9 There are comments within the Local Impact Reports which seek a percentage greater than 10% BNG, noting BNG is being offered for this Project on a voluntary basis. The Applicant's strategy is to deliver 'quality' over 'quantity' and ensure that its BNG leaves the greatest value and benefit from consumer-funded BNG. 10% is not seen as a specific target or cap and the Applicant will seek opportunities to deliver more than 10% where viable.

- 3.13.10 While every effort has been made to deliver the required biodiversity units on-site through replacement planting and on-site mitigation in the form of habitat creation and enhancement, given the scale and nature of the Project, 10% net gain is not fully achievable on-site. Off-site biodiversity units are therefore proposed to make up this deficit as identified within **7.1 Biodiversity Net Gain Report [APP-299]**.

Monitoring and Maintenance Period

- 3.13.11 A number of local authorities have raised concerns within their LIRs regarding the length of the aftercare period for reinstatement planting, with requests ranging from extending the period to 10 years, to including an agreed upfront planting failure rate.
- 3.13.12 The approach taken to replacement planting and BNG has been set out in detail in **7.1 Biodiversity Net Gain Report [APP-299]** in paragraphs 3.5.2 to 3.5.7 and through consultation, Natural England confirmed that this approach was acceptable prior to mandatory BNG for NSIPs.
- 3.13.13 On completion of construction of the Project, land would be returned to the landowner across the majority of the length of the alignment, with the exception of the Environmental Areas, and would return to previous long-term management. The Applicant has committed to monitoring/managing all tree, hedgerow and aquatic planting on-site for five years. Long-term management, monitoring and reporting of the Environmental Areas will be undertaken for a minimum of 30 years.
- 3.13.14 The five-year monitoring period for replacement planting (outside the Environmental Areas) is considered sufficient to ensure successful plant establishment. All reinstatement planting will be undertaken by a suitably experienced contractor in line with British Standards outlined in BS 4428:1989³³, and BS 8545:2014³⁴, and will adhere to the general principles outlined in **7.4 Outline Landscape and Ecological Management Plan [Revision C]**. Section 11.2 of BS 8545:2014 states *'Post-planting management and maintenance is important if longevity in the landscape is to be achieved. A full young tree management programme with budgetary provision should be in place for all planting schemes. This management programme should be in place for at least 5 years.'* The timeframe is also consistent with other National Grid projects, most recently reflected in the Bramford to Twinstead Development Consent Order and is considered proportionate.
- 3.13.15 In addition to committing to a five-year aftercare period, the Applicant has committed to this period also being adaptive, to reflect the results of the ongoing monitoring of new tree and hedgerow planting. The adaptive aftercare commitment is made within **7.4 Outline Landscape and Ecological Management Plan [Revision C]**. This may include the use of alternative native tree/hedgerow species, should it be found during the monitoring period that a significant amount of the original tree/hedgerow species used had failed and therefore is considered unsuitable for that location. This will be determined by the Landscape Clerk of Works. It is considered that the aftercare period, alongside the adaptive nature of the aftercare, will be sufficient to achieve successful site establishment.

³³ British Standards Institution (1989) BS 4428:1989 Code of Practice for general landscape operations (excluding hard surfaces)

³⁴ British Standards Institution (2014) BS 8545:2014 Trees: from nursery to independence in the landscape – Code of practice

- 3.13.16 Requirement 9(7) (reinstatement planting plan) of **3.1 Draft Development Consent Order [APP-056]** secures the replacement of any trees or hedgerows planted as part of an approved reinstatement planting plan that, within a period of five years after planting, are removed, die or become seriously damaged or diseased. It is noted that there is a request within the LIRs for a planting failure rate to be agreed. Given the commitment in Requirement 9(7), this is not considered necessary.

Off-site Delivery of BNG

- 3.13.17 The requests within the LIRs for off-site BNG to be delivered locally are noted. The Applicant's approach is to provide any on-site BNG in a co-ordinated manner in locations that do not prejudice the siting or routeing of future electricity infrastructure. This approach is in the best interests of nature and is economic and efficient because it safeguards on-site BNG and means that on-site landscape screening or other environmental mitigation can also contribute towards BNG. Given the scale of the Project, and because most of the land within the Order Limits will be returned to its original use, predominantly agriculture, the majority of the Project's BNG is not deliverable on-site. BNG delivered off-site would be delivered through expert partners and biodiversity units purchased from providers registered on the Biodiversity Gain Site Register. This approach means that, for the most part, responsibility for implementation, management and reporting of BNG rests with experienced nature conservation organisations and land managers for which this is their area of expertise and core business.
- 3.13.18 Biodiversity is not bound by local authority area and therefore off-site BNG will be considered across the length of the Project. However, as detailed within **7.1 Biodiversity Net Gain Report [APP-299]**, the aim is to deliver a biodiversity legacy ideally in each of the three counties crossed by the Project (Norfolk, Suffolk and Essex). Off-site BNG sites will be selected based on a range of factors including proximity to the Project, geographical location, habitat type, habitat condition, cost and timings amongst others, including the local nature recovery strategies (LNRSs). The Applicant will consider provision of BNG within areas identified in LNRS areas where sites are available and are appropriate to Project circumstances, a matter which has been raised in the LIRs. The Applicant's BNG approach seeks to ensure that biodiversity creation and enhancement is delivered in the right places for nature, is aligned with national and local policy objectives, and is managed and monitored by specialist organisations.

Monitoring and Management of Off-site BNG

- 3.13.19 Questions have been raised in LIRs regarding how the off-site BNG will be monitored and managed. All off-site BNG will be managed by third-party providers as per the habitat management and monitoring plan prepared specifically for the off-site location and agreed with Natural England. Registered BNG providers are already legally obligated to deliver the required biodiversity units, within a set time frame, on the purchase of a biodiversity unit. No further legal commitments are needed for the monitoring and management of off-site BNG sites with local authorities.

Legal Agreement Securing Off-site BNG

- 3.13.20 The Applicant has prepared Heads of Terms regarding a unilateral undertaking to be given by National Grid to the Local Planning Authorities along the Project route under s.106 of the Town and Country Planning Act 1990 ('s.106 UU'), relating to obligations

designed to secure at least 10% BNG as part of the Project. As it will not be achievable to secure 10% net gain entirely through on-site habitat enhancement and creation measures, the Applicant will seek to acquire biodiversity units from third-party BNG providers, to make up the shortfall from on-site habitat creation and enhancement. A s.106 UU is seen as the most appropriate option to legally secure the Applicant's commitment to delivering 10% BNG as it allows greater flexibility to draft detailed obligations and secures strong enforcements for the benefit of the local planning authorities receiving the s.106 UU. It is not considered that a bilateral agreement or a requirement with **3.1 Draft Development Consent Order [APP-056]** is necessary or appropriate.

Environmental Net Gain Including Green Infrastructure

- 3.13.21 The Applicant's commitment in relation to Environmental Net Gain (ENG) has been raised in some LIRs in addition to references to Green Infrastructure. The Applicant supports the delivery of ENG including Green Infrastructure. NPS EN-1 (2024) provides a definition of Green Infrastructure which relates to both multi-functional green and blue spaces in addition to other natural features. The Applicant's commitment to the delivery of 10% BNG forms part of ENG and includes the delivery of wider environmental and societal benefits which includes Green Infrastructure.
- 3.13.22 The Applicant will continue to explore a range of options to deliver BNG which provide the best choices and outcomes for nature and wider environmental and societal benefits and provide value for money for consumers.
- 3.13.23 Overarching National Policy Statement for Energy³⁵ (NPS EN-1) (2024) paragraph 4.6.13 highlights the potential for developments to deliver wider environmental gains and benefits to communities in addition to BNG. The Applicant's commitment reflects this ambition. While the mitigation hierarchy is being adhered to, with on-site mitigation incorporated into the Project's Order Limits where practicable, any required off-site BNG will be part of a careful site selection process. The off-site selection process will include consideration of other additional environmental and societal benefits (in line with NPS EN-1 (2024) and EN-5³⁶ (2024)) alongside the required biodiversity units. This would include consideration of the potential for wider habitat connectivity and enhancements for example, as well as consideration of specific areas of particular importance for biodiversity.
- 3.13.24 Sites that provide wider environmental and societal benefits including Green Infrastructure will be a consideration in the site selection process, in accordance with NPS EN-1 (2024). Full details of the off-site solution and added environmental and societal value would be reported through the final iteration of the Biodiversity Net Gain Report, delivered post-consent.
- 3.13.25 In addition to this, paragraph 4.6.13 of EN-1 (2024) highlights as one of the potential beneficial measures '*the enhancement, expansion or provision of trees and woodlands*'. The Applicant's 3:1 replacement ratio for individual trees would fall into this category. Further detail is provided within the replacement tree planting section of this document and also **7.4 Outline Landscape and Ecological Management Plan [Revision C]**.

³⁵ Department for Energy Security and Net Zero (2024) Overarching National Policy Statement for Energy

³⁶ Department for Energy Security and Net Zero (2024) National Policy Statement for Electricity Networks Infrastructure

- 3.13.26 As stated above, The Applicant's BNG approach seeks to ensure that biodiversity creation and enhancement is delivered in the right places for nature, is aligned policy, and managed appropriately.

WaLOR Project

- 3.13.27 The Applicant is currently engaging with Suffolk Wildlife Trust on the Waveney and Little Ouse Landscape Recovery (WaLOR) project on the potential delivery of biodiversity units within the WaLOR scheme. The WaLOR project is a landscape recovery scheme funded by the Department for Environment, Food and Rural Affairs that focuses on the restoration and enhancement of the Waveney and Little Ouse river catchments on the Norfolk/Suffolk border. The project is led by Suffolk Wildlife Trust in partnership with the Environment Agency. The WaLOR project is located in the same geographic area as the Project and has the potential to offer the habitat types required. The project is identified within the LNRS, which encourages BNG delivery in this area and offers a significant number of ecologically valuable units and wider environmental benefits.

3.14 Land Use - Green Belt

Local Authority positions

- 3.14.1 Four Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 3.13 Land Use - Green Belt - Local Impact Report coverage

Local Authority	Paragraph(s) covering this topic
Norfolk County Council	N/A
Suffolk County Council / Babergh District Council and Mid Suffolk District Council	N/A
Essex County Council	4.3.48
Thurrock Council	6.15.6
South Norfolk District Council	N/A
Tendring District Council	N/A
Colchester City Council	N/A
Braintree District Council	N/A
Chelmsford City Council	8.19 -8.27
Brentwood Borough Council	6.4 - 6.6

The Applicant's Position

Introduction

- 3.14.2 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. The Applicant considers that the proposed Tilbury North

Substation and Cable Sealing End (CSE) compound works may be considered inappropriate development as they would not preserve the openness of the Green Belt. Very Special Circumstances (VSC) would be required to justify their acceptability.

- 3.14.3 The national electricity transmission system transports energy from where it is generated to where it is used, in homes, schools, hospitals, businesses, and factories. Electricity networks are an established feature in our landscapes, taking energy across open countryside to towns and cities where it is needed. To ensure the national electricity network can transport energy efficiently there are numerous electricity transmission connections crossing Green Belts. A number of these connections are by way of overhead lines. By their nature, electricity transmission infrastructure (overhead lines) within the Green Belt is inevitable due to the need to transport energy around the country and the need to avoid the most built-up areas around our towns and cities.
- 3.14.4 The Metropolitan Green Belt was formally introduced in the Green Belt (London and Home Counties) Act 1938. It is the largest area of Green Belt surrounding an urban core (London) and accounts for 31% of England's total Green Belt area. The London Metropolitan Green Belt encompasses local authorities in and around Greater London including host authorities for the Project, Chelmsford City Council, Brentwood Borough Council, Basildon Borough Council and Thurrock Council. This provides useful detail and context of the Green Belt for the Project.
- 3.14.5 The primary purpose of the Metropolitan Green Belt is to prevent urban sprawl by keeping land permanently open around major urban areas. This includes checking the unrestricted growth of built-up areas, preventing neighbouring towns from merging, safeguarding the countryside, and preserving the character of historic towns.

Policy Context

- 3.14.6 Paragraph 5.11.20 of National Policy Statement (NPS) EN-1³⁷ sets out that within the Green Belt there is a general presumption against inappropriate development unless there are VSC to justify that development being consented. Paragraph 5.11.37 sets out that *'very special circumstances are not defined in national planning policy as it is for the individual decision maker to assess each case on its merits and give relevant circumstances their due weight. However, when considering any planning application affecting Green Belt land, the Secretary of State should ensure that substantial weight is given to any harm to the Green Belt when considering any application for such development, while taking account, in relation to renewable and linear infrastructure, of the extent to which its physical characteristics are such that it has limited or no impact on the fundamental purposes of Green Belt designation. Very special circumstances may include the wider environmental benefits associated with increased production of energy from renewables and other low carbon sources'*.
- 3.14.7 Paragraph 4.2.16 sets out that where a project is critical national priority (CNP) Infrastructure the Secretary of State will take as a starting point for decision making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or VSC. Paragraph 4.2.17 identifies that this assumption

³⁷ Department for Energy Security and Net Zero (2024) *Overarching National Policy Statement for Energy (EN-1)*

includes where development is within a Green Belt and requires VSC to justify development.

- 3.14.8 Paragraph 143 of the National Planning Policy Framework (NPPF)³⁸ identifies the five purposes of the Green Belt. These are:
- *‘To check the unrestricted sprawl of large built-up areas*
 - *To prevent neighbouring towns merging into one another*
 - *To assist in safeguarding the countryside from encroachment*
 - *To preserve the setting and special character of historic towns*
 - *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.’*
- 3.14.9 Paragraph 153 of the NPPF identifies that local authorities should ensure that substantial weight is given to any harm to the Green Belt when considering planning applications. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in VSC. VSC will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. Paragraph 154 notes that development is inappropriate in the Green Belt unless an exemption applies. Subsection 154 (h)(ii) notes that engineering operations may be appropriate development provided that the proposal preserves the openness and does not conflict with the purposes of including land in the Green Belt.
- 3.14.10 Paragraph 155 of the NPPF states that ‘the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:
- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
 - b. There is a demonstrable unmet need for the type of development proposed;*
 - c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
 - d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below’.*
- 3.14.11 The Consultation Draft NPPF (2025)³⁹, Policies GB6 Control of Development in the Green Belt and GB7: Development which is not inappropriate in the Green Belt redrafts current NPPF paragraphs 153 and 160 to clarify the approach to inappropriate development in the Green Belt. It consolidates considerations relating to inappropriate development in the Green Belt, noting that ‘electricity network’ may not be inappropriate development where it maintains the openness of the Green Belt.

Overview

- 3.14.12 Some electricity infrastructure such as overhead lines, are considered to be engineering operations. By the nature of their design, and the sensitive siting, some

³⁸ Ministry of Housing, Communities and Local Government (2024) *National Planning Policy Framework*

³⁹ Ministry of Housing, Communities and Local Government (2025) *National Planning Policy Framework: draft text for consultation*

of this infrastructure such as pylons and conductors may not be considered inappropriate development in the Green Belt as they do not conflict with Green Belt purposes and preserve openness. Although overhead lines may occupy long corridors within Green Belt, they involve little physical change to the land through which they pass and leave a large majority of the land beneath them free from development and therefore open. As pylons are spaced up to approximately 360 m apart the perception of openness is maintained as one is able to ‘see through’ the widely spaced pylons and conductors to whatever is beyond.

- 3.14.13 However, other components of the Project such as substations and CSE compounds, by their design may be considered inappropriate development in the Green Belt, because they comprise a physical development footprint which may not be considered to preserve the openness of the Green Belt.
- 3.14.14 The **5.6 Planning Statement [APP-085]** (paragraphs 7.3.514 to 7.3.519) provides details of the suitability of transmission infrastructure in the Green Belt. It acknowledges the Secretary of State’s decision and the Examining Authority’s (ExA) report on the Yorkshire GREEN project⁴⁰. In terms of the substation and CSE compounds (CSECs), the ExA recommendation report found that *‘the considerable physical scale of the proposed works and their permanence would undoubtedly fail to preserve the openness of the York and Leeds Green Belts...in terms of the purposes of including land within the Green Belt, we find that the proposed Overton and Monk Fryston Substations and the proposed CSECs would, by their presence and physical scale, fail to safeguard the countryside from encroachment. We do not consider that there would be conflict with any of the other four Green Belt purposes’*. The report then goes on to state that *‘the ExA considers that even if the proposed substations and CSECs did constitute ‘engineering operations’, they would not benefit from the exception in NPPF para 150. Therefore, in our view, it is correct to consider the proposed substations and CSECs as inappropriate development’*.
- 3.14.15 In terms of the overhead lines, the ExA recommendation treated the proposed new pylons, overhead lines, reconductoring works to existing overhead lines and pylons and temporary construction works as ‘engineering operations’. This approach was also adopted by the ExA in its report on the Hinkley Point C Connection Project.
- 3.14.16 Considering the ExA’s conclusions for both Yorkshire GREEN and the Hinkley Point C Connection Project, the Applicant’s position for the Project follows the same approach that the proposed overhead lines are engineering operations (and therefore, may be considered appropriate development in the Green Belt) provided that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within the Green Belt. The proposed CSE compounds and Tilbury North Substation which are located within the Green Belt are considered to be inappropriate development.

Assessment of the Project Against the Five Purposes of the Green Belt

- 3.14.17 The Applicant’s position is that the proposed CSE compound works and substation may be considered inappropriate development as they would not preserve the openness of the Green Belt. VSC would be required to justify their acceptability.
- 3.14.18 **6.13.A2 Environmental Statement Appendix 13.2 - ES Appendix 13.A2: Landscape Baseline and Assessment [(APP-228)],** paragraph 13.3.1046 notes

⁴⁰ Planning Inspectorate (2023) *Yorkshire Green Energy Enablement Project. Examining Authority’s Report of Findings and Conclusions and Recommendation to the Secretary of State for Energy Security and Net Zero*

that the ‘introduction of the Tilbury North Substation and overhead line, as well as [two] CSE compounds, would affect the ‘panoramic views from high points’, although would generally not affect the views ‘across the neighbouring marshes and the Thames estuary’ which are directed away from the Project. Seen in the context of existing infrastructure and set within the large scale field pattern and landform, the Project would not overwhelm the underlying landscape, but would be a noticeable new feature’. The assessment notes that once the landscape mitigation and enhancement shown in **7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals** Appendix D of the **Outline Landscape and Ecological Management Plan [(APP-325)]** would by Operational Year 15 help to integrate the Tilbury North Substation within the surrounding landscape, reducing the significance of effect.

- 3.14.19 Taking these considerations into account, and acknowledging that there would be some harm, VSC need to exist to outweigh the harm.
- 3.14.20 Consistent with the approach from Yorkshire GREEN and the Hinkley Point C Connection Project, 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.
- 3.14.21 The Applicant considers that pylons and overhead lines do not harm four of the five purposes of the Metropolitan Green Belt (as set out in paragraph 143 of the NPPF). The table below demonstrates the impact upon the five purposes of the Green Belt.
- 3.14.22 The Applicant considers that the substation and CSE compounds do not harm four of the five purposes of the Metropolitan Green Belt (as set out in paragraph 143 of the NPPF). The table below demonstrates the impact upon the five purposes of the Green Belt.

Table 3.14 Assessment of the substations, CSE compounds, pylons and overhead line against the five purposes of the Green Belt

Purposes	Assessment of Substations and CSE Compounds	Assessment of Pylons and Overhead Line
To check the unrestricted sprawl of large built-up areas	The proposed substation at Tilbury North is not located adjacent to a large built-up area and would not result in unrestricted sprawl. The substation and associated CSE compounds are located as close as possible to the existing infrastructure where it can interface with the existing ZB and YYJ line in the Green Belt. The proposed future development sites in the wider surrounding area (identified as opportunity areas within the Regulation 18 Thurrock Local Plan) currently remain at an early stage in the plan-making process, and subject to progressing into future stages there will be opportunities for these potential development sites to be carefully planned and designed. Within the Green Belt in Thurrock CSE compounds are required to allow for modifications to the existing ZB and YYJ infrastructure south of the proposed Lower Thames Crossing (LTC) project. They do not have any physical connection with a settlement and have been located away from built up areas. Accordingly, it is considered that the nature of these isolated features would not facilitate future outward growth or constitute a form of urban sprawl that this purpose is seeking to constrain. The Applicant does note the interaction between the Project and consented Lower Thames Crossing (TR010032) and the EIA Screening submitted on behalf of Bloor Homes to Thurrock Council in March 2025 (Thurrock Application Reference 25/00333/SCO) for <i>residential development of up to 1,500 dwellings (Use Class C3), a primary school (Use Class F1), retail floor space and healthcare floor space as part of a mixed use neighbourhood centre (Use Classes E, F1, F2, C3, C2, Sui Generis hot food takeaway, drinking</i>	There is no physical connection with any settlement, and the proposal would not constitute a form of urban sprawl that this purpose is seeking to constrain.

Purposes	Assessment of Substations and CSE Compounds	Assessment of Pylons and Overhead Line
	<i>establishment), site accesses and highway works (Scenario A without Lower Thames Crossing and Scenario B with Lower Thames Crossing), associated infrastructure, ancillary works, green and blue infrastructure including sustainable drainage systems, ecological habitat areas, childrens play areas, public open space, playing fields and Suitable Alternative Natural Greenspace.</i> The boundaries of the proposed development overlap with the Project's proposed YYJ temporary and permanent overhead line works, and several cable compounds. The boundary of the site would sit outside, but immediately west, of the Cable Sealing End Compound 2 Tilbury and immediately south of Tilbury North Substation. Both the Bloor Homes proposal and consented Lower Thames Crossing will further urbanise this part of the Green Belt. While the proposed Tilbury North Substation and CSE compounds would introduce built form into the Green Belt, it would be compact, self-contained operational infrastructure, physically and functionally separate from the edge of the nearest built-up areas. As such, they would not contribute to the outward expansion of Chadwell St. Mary nor represent unrestricted sprawl. Any harm arising is therefore limited in relation to this specific Green Belt purpose.	
To prevent neighbouring towns merging into one another	The proposed Tilbury North Substation is located between Chadwell St Mary, Southfields and Linford. The Project is not an extension of the existing settlements, rather it sits between them and does not adjoin the settlements. The development would not result in the merging of settlements, and there would be no coalescence. The Project has considered LTC and the Southfields development, should it come forward, ensuring that it will not constrain the ability to bring the development forward.	The new pylons and overhead lines are located through Basildon, Brentwood, Chelmsford and Thurrock. They do not result in urban coalescence and neighbouring towns or settlements will not merge into one another as a single entity.

Purposes	Assessment of Substations and CSE Compounds	Assessment of Pylons and Overhead Line
	The proposed CSE compounds do not adjoin any settlements and in isolation, or cumulatively result in a merger of towns.	
To assist in safeguarding the countryside from encroachment	The proposed Tilbury North Substation and CSE compounds would encroach into the countryside. The purposes of the Green Belt in the ExA recommendation for Yorkshire GREEN also concluded that <i>‘the Proposed Development would result in a moderate adverse effect on Green Belt openness and would conflict with the purpose of the Green Belt to safeguard the countryside from encroachment’</i>. Considering the ExA recommendation for Yorkshire GREEN, in terms of Purpose 3 (to assist in safeguarding the countryside from encroachment), particularly Tilbury North Substation, by its presence and physical scale, would unlikely safeguard the countryside from encroachment. It would therefore conflict with Purpose 3 (or ‘c’) of the Green Belt. This approach is consistent with the recommendations as set out in the Yorkshire GREEN ExA recommendation.	The purposes of the Green Belt in relation to new pylons and overhead lines in the ExA recommendation for Yorkshire GREEN concluded that <i>‘In considering the purposes of including land within the Green Belt, we find that the proposed new pylons, new overhead lines and construction compounds would, albeit to a limited extent, represent encroachment into the countryside. We are satisfied that they would not conflict with the four other Green Belt purposes...’</i>. Considering the ExA recommendation for Yorkshire GREEN, in terms of Purpose 3, the Applicant does consider that there may be limited encroachment into the countryside. The new pylons and overhead lines do not act as a precedent for other forms of development and are not an enabler or facilitator for other forms of development, because the pylons and overhead lines would not draw development towards them, and the pylons would not divert other development away from more appropriate locations. The Applicant’s approach is consistent with the recommendations as set out in the Yorkshire GREEN ExA recommendation.
To preserve the setting and special character of historic towns	The proposed Tilbury North Substation and CSE compounds are not located near to any historic towns. Particularly in Thurrock, the Council’s Green Belt Assessment does not assess Purpose 4 as none of the towns within the borough are regarded as truly historic towns.	The proposed pylons and overhead lines are not located near to any historic towns. Particularly in Thurrock, the Council’s Green Belt Assessment does not assess Purpose 4 as none of the towns within the borough are regarded as truly historic towns.

Purposes	Assessment of Substations and CSE Compounds	Assessment of Pylons and Overhead Line
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	The locations of the CSE compounds required to underground existing overhead lines are dictated by the location of existing infrastructure (as set out in the 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]), and therefore it would not be possible from an engineering perspective to locate them in an alternative location (such as derelict / urban land), without significant additional infrastructure and associated environmental impacts. The position of the proposed Tilbury North Substation has been subject to an iterative design development. The 5.15 Design Development Report [APP-122] and the 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] detail the changes to the Project following the 2024 statutory consultation and 2025 targeted consultations. The changes included connecting electrically to Tilbury Substation via a new substation (Tilbury North) connected to the existing Tilbury Substation via a modification to the 400 kV YYJ line, rather than into the Freeport area. The alternative connection arrangement was developed following consultation feedback and technical review identifying challenges with the Freeport interaction and development constraints. It avoids potential impacts on economic viability of the Freeport area.	As the location of the pylons and overhead lines is dictated by the location of existing infrastructure (as set out in the 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]), it would not be possible from an engineering perspective to locate them in an alternative location (such as derelict / urban land), without significant additional infrastructure and associated environmental impacts.

Grey Belt

- 3.14.23 Paragraph 155 of the NPPF states that *‘the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:*
- The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
 - There is a demonstrable unmet need for the type of development proposed;
 - The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and
 - Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below’.
- 3.14.24 The NPPF defines ‘grey belt’ land as ‘For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development’.
- 3.14.25 The proposed substation at Tilbury North is located on greenfield land (Grade 2 agricultural land) and not previously developed land. The definition of grey belt suggests that land that does not strongly contribute to any of purposes (a), (b) or (d) in paragraph 143 of the NPPF could be defined as grey belt. The assessment of the purposes above sets out that the substation could (to a limited extent) impact upon purpose (a) to check the unrestricted sprawl of large built-up areas. The grey belt policy exception could therefore apply to Tilbury North substation, subject to whether it is considered to ‘strongly contribute’ to this purpose.

Very Special Circumstances

- 3.14.26 The Applicant considers that the works to existing pylons/overhead lines would not result in any material visual or spatial alterations to the existing pylons and overhead lines. As a result, the level of change would be immaterial and therefore the openness and purposes of the Green Belt would not be affected.
- 3.14.27 The Applicant’s position is that the proposed Tilbury North Substation and CSE compound works may be considered inappropriate development as they would not preserve the openness of the Green Belt. VSC would be required to justify their acceptability. The **5.6 Planning Statement [APP-085]** details the VSC applicable in this instance to justify inappropriate development.
- 3.14.28 The VSC for the Project are:
- The UK government policy requires significant reinforcement of the transmission system to facilitate the connection of renewable energy sources to transport electricity to where it is used

- The British Energy Security Strategy sets targets for the connection of up to 50 GW of offshore wind by 2030s as a key part of a strategy for secure, clean and affordable British energy for the long term
- New connections for offshore wind and nuclear power generation projects, and for interconnectors, are expected into East Anglia by 2030. These connections are being constructed or expected to connect into substations at Necton, Norwich Main, Bramford, Friston and Sizewell
- Without reinforcement, the capacity of the East Anglia existing network is insufficient to accommodate the connection of the proposed new power sources. Therefore, reinforcement of the network is required
- The requirement to meet net zero by 2050, to replace the fossil fuels that once powered the economy with low-carbon electricity
- By reinforcing the capacity of East Anglia, the Project will address the need to be able to accommodate the connection of the proposed new power sources, namely offshore wind and nuclear power generation projects, as required by 2030.

3.14.29 Whilst the needs case justifies the Project's VSC, the current position as set out in NPS EN-1, is that CNP Infrastructure, subject to the application of the mitigation hierarchy (see Chapter 2 – Overarching Policy Context of this document), meets the test in relation to requiring VSC to justify development and the Green Belt tests have been met. Paragraph 4.2.17 of NPS EN-1 (2024) also confirms that '*...the Secretary of State will take as a starting point that critical national priority infrastructure will meet the following, non-exhaustive, list of tests: Where development within a Green Belt requires very special circumstances to justify development*'.

3.15 Socio-economics, Recreation and Tourism - Community Benefits

Local Authority Positions

3.15.1 Nine Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 3.15 Socio-economics, Recreation and Tourism - Community Benefits - Local Impact Report coverage

Local Authority	Paragraph(s) covering this topic
Norfolk County Council	N/A
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	4.19 - 4.21
Essex County Council	3.6.1 - 3.6.4, 4.2.12, 4.8.31, 4.9.44, 4.9.54, 5.7.40
Thurrock Council	6.12.10, 6.14.25
South Norfolk District Council	8.5.1
Tendring District Council	6.13, 17.1 - 17.2

Local Authority	Paragraph(s) covering this topic
Colchester City Council	4.8
Braintree District Council	17.7 - 17.7.3, 18.2.41
Chelmsford City Council	9.1, 9.39 - 9.40, 11.53, 11.55
Brentwood Borough Council	6.75 - 6.78, 10.8

The Applicant's Position

- 3.15.2 The government has published guidance on community funds for transmission infrastructure⁴¹. 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.
- 3.15.3 The Applicant is committed to providing a coordinated local and regional approach to community benefits. In spring 2026, the Applicant will begin consulting on how the community benefit funding should be used. This will be an opportunity for the Applicant to engage with local communities and elected representatives on local priorities and where community benefit funds could deliver long-lasting benefits. The feedback received will help shape and inform the Applicant's community benefit strategy. The Applicant also notes the suggestions provided by the Local Authorities in the Local Impact Reports.
- 3.15.4 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 Development Consent Order, as per the Community Funds for Transmission Infrastructure guidance⁴¹.
- 3.15.5 The Applicant is accountable for the delivery of community benefit initiatives through its existing regulatory and funding arrangements. Community benefit funding is allocated to National Grid for this purpose and is subject to oversight by Ofgem, in accordance with government guidance on community funds. This will include requirements to account for expenditure and demonstrate that funds are used in accordance with agreed regulatory objectives. As a result, while community benefits are not secured through the Development Consent Order or relied upon as mitigation, their delivery is subject to external scrutiny through established regulatory reporting mechanisms. This provides transparency and accountability for the use of community benefit funding, independently of the planning regime.
- 3.15.6 Separate to community benefits, the government has announced its intention to develop a bill discount scheme for households located within 500 metres of new transmission infrastructure. This remains an area of evolving government policy. The Planning and Infrastructure Act 2025 provides the government with the enabling powers to establish a scheme, with further regulations and secondary legislation required before it can be brought into operation.

⁴¹ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure*

3.16 Socio-economics, Recreation and Tourism - Employment, Skills, Training and Local Supply Chain

Local Authority Positions

- 3.16.1 All Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 3.16 Socio-economics, Recreation and Tourism - Employment, Skills, Training and Local Supply Chain - Local Impact Report coverage

Local Authority	Paragraph(s) covering this topic
Norfolk County Council	4.4, 12.1, 12.3, 12.9, Table 3, Appendix A
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	4.19 – 4.21, 10.1 – 10.7, Table 8
Essex County Council	2.5.9 – 2.5.12, 3.7.12 – 3.7.16, 4.8.2 - 4.8.15, 4.8.23 – 4.8.31, 5.7.38
Thurrock Council	6.7.2, 6.7.17, 6.7.20, 6.14.11 - 6.14.12, 6.14.25
South Norfolk District Council	9.5.1, Appendix D 1.7.1.3
Tendring District Council	17.1 – 17.2, 21.1 – 21.5
Colchester City Council	1.8, 11.10, 11.27 - 11.30
Braintree District Council	17.1. 4 - 17.1.7
Chelmsford City Council	8.484, 8.4.91, 9.30 - 9.38
Brentwood Borough Council	6.74 - 6.78

The Applicant's Position

- 3.16.2 The Applicant has carefully reviewed the matters raised by Local Authorities in their Local Impact Reports in relation to employment, skills, training and the local supply chain.
- 3.16.3 As stated in the **8.4.1 Applicant's Comments on the Relevant Representations [REP1-132]**, 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 as set out in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**. Due to the characteristics of the works, the maximum peak on-site construction workforce attributable to local labour is anticipated to be approximately 172 Full Time Equivalent (FTE) roles, with a total local job demand of approximately 480 roles across the four-year construction period. This level of employment is modest in scale and is not considered significant when compared with employment demand in other sectors or large-scale regeneration schemes.

- 3.16.4 The Applicant is committed to supporting skills development and workforce planning at both local and regional levels, beyond the scope of this individual Project and explained in **8.4.1 Applicant's Comments on the Relevant Representations [REP1-132]** that supporting these matters forms part of the Applicant's wider approach to community and legacy benefits and given the modest scale of potential employment would be dealt with separate from, the Development Consent Order process.
- 3.16.5 The Applicant recognises that Local Impact Reports raise concern over how these measures will be secured.
- 3.16.6 Regarding community benefit, this is addressed in more detail in the Applicant's response to Local Impact Reports Chapter 3, Socio-economics, Recreation and Tourism – Community Benefits. .
- 3.16.7 Regarding employment and skills, the Applicant recognises the importance that host communities and host authorities place on social value including employment opportunities, skills development and local supply chain participation associated with a project of this scale and duration. The Applicant also acknowledges that a number of Local Impact Reports express concern about the absence, at application stage, of a single consolidated document setting out how these matters would be approached in practice.
- 3.16.8 In response, to elaborate on what the Applicant set out in response to Relevant Representations and without prejudice to the Applicant's position that such matters do not constitute mitigation, the Applicant now proposes to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that National Grid and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project. In preparing the Employment and Skills Plan, the Applicant will engage with Host Planning Authorities and relevant stakeholders on its scope (via Statements of Common Ground where relevant) to ensure that the scope and status of the Employment and Skills Plan are clearly understood and appropriately reflected in the Examination record. Recognising the value of local labour market intelligence, existing skills initiatives and established partnership arrangements, the document will appropriately reflect local contexts along the route, while remaining proportionate and deliverable within a multiauthority Nationally Significant Infrastructure Project framework.
- 3.16.9 The Applicant confirms that the Employment and Skills Plan will address matters raised across the Local Impact Reports, including:
- The approach to construction employment and workforce composition
 - Opportunities for skills development, apprenticeships and training aligned with industry standards
 - Engagement with education providers and skills bodies where appropriate
 - Principles for local and regional supply chain engagement
 - Coordination with The Great Grid Partnership's established delivery processes.
- 3.16.10 The Applicant emphasises that these matters are presented as part of a broader commitment to responsible project delivery and effective communication with host communities, rather than as mitigation for adverse effects.

- 3.16.11 The commitment to implementing the project in accordance with an Employment and Skills Plan will be secured by way of a DCO Requirement to be added into the Draft DCO. The Applicant will consider the drafting of this requirement and add the wording into the Draft DCO in due course.

3.17 Safety and Security - Airfields

Local Authority Positions

- 3.17.1 Two Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 3.17 Safety and Security - Airfields - Local Impact Report coverage

Local Authority	Paragraph(s) covering this topic
Norfolk County Council	4.4, 12.1-12.2, 12.4-12.6, 12.8
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	6.1-6.33, Appendices 24, 25 & 25
Essex County Council	N/A
Thurrock Council	N/A
South Norfolk District Council	N/A
Tendring District Council	N/A
Colchester City Council	N/A
Braintree District Council	N/A
Chelmsford City Council	N/A
Brentwood Borough Council	N/A

The Applicant's Position

- 3.17.2 The Applicant's approach to the assessment of Project aviation impacts, informed by consultation with aviation stakeholders, and the subsequent incorporation of design changes to minimise adverse effects, where possible, is described within **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]**. The Appendix outlines how the approach is in accordance with applicant responsibilities as defined in the Overarching National Policy Statement for Energy (EN-1)⁴², together with the National Policy Statement for Electricity Networks Infrastructure (EN-5)⁴³, with account also taken of the provisions of the National Planning Policy Framework (NPPF)⁴⁴, supplementary Planning Practice Guidance and relevant aviation-specific regulation and related guidance. It is noted that

⁴² Department for Energy Security and Net Zero (2024) *Overarching National Policy Statement for Energy (EN-1)*

⁴³ Department for Energy Security and Net Zero (2024) *National Policy Statement for Electricity Networks Infrastructure (EN-5)*

⁴⁴ Ministry of Housing, Communities and Local Government (2024) *National Planning Policy Framework*

proposed changes to the NPPF⁴⁵ continue to emphasise the importance of maintaining a national network of aviation airfields, but this is now explicitly balanced with the need for consideration of Nationally Significant Infrastructure Projects and any relevant national policy statements. We acknowledge the aviation-related policy requirements of the Babergh & Mid Suffolk Joint Local Plan and consider these to be consistent with national policy requirements.

- 3.17.3 The Applicant has welcomed Councils' support to its engagement with aviation stakeholders including the Civil Aviation Authority Airfields Advisory Team (CAA AAT) and aerodrome operators. **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** recognises aerodrome operator responsibilities for safeguarding, the Civil Aviation Authority's (CAA's) regulatory responsibilities relating to licensed and officially safeguarded civil aerodromes, and the separate remit of the now disbanded CAA AAT to advise operators in relation to safeguarding. Paragraph 15.3.15 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** reflects that CAA AAT consultation resulted in development of Study Area parameters, mutual recognition of multiple site-specific risk factors, and independent peer review of impact assessments.
- 3.17.4 With regards to consideration of CAA guidance, paragraph 15.2.18 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** notes CAP 793⁴⁶ advises that runways should, wherever possible, be designed such that power lines or other obstacles do not obstruct their approach and take-off paths, and recommends that there are no obstacles greater than 150 ft above the average runway elevation within 2,000 m of the runway mid-point. This parameter is not a minimum requirement, however, and the guidance focus is on approach and take-off path obstruction, not the general proximity of obstacles to aerodromes, which is important as ensures proportionate consideration of operational impacts. Paragraph 15.3.23 explains further how the Applicant's impact assessment approach responds to CAP 793 but enables more nuanced assessment consistent with the CAA AAT-advised, multi-factorial assessment approach.
- 3.17.5** The CAA AAT's Position Statement (March 2025) recognised efforts undertaken by the Applicant to establish and mitigate impacts, agreeing with impact assessments conclusions for the majority of aerodromes within scope, and noting modifications to the proposed Project alignment implemented to minimise adverse effects where these have been identified. The AAT named three aerodromes (Raydon Wings, Priory Farm and Tibenham) for which it advised further consideration was required. For each of these aerodromes, the conclusions of Applicant impact assessments as well as stakeholder feedback were considered but determined not to justify changes (or in the case of Raydon Wings, further changes) to the Project design on the grounds of aviation safety or operational impacts. Further detail of this consideration is shown within **7.20 2023 – Design Development Report for the Project [APP-358]**, **7.21 2024 – Design Development Report for the Project [APP-359]** and **5.15 Design Development Report [APP-122]**.
- 3.17.6 The three named operators have not yet agreed the acceptability of the proposed alignment, but alternative methodologies for undertaking objective, quantified impact assessments have not been identified by stakeholders, nor sufficient operational information shared to verify or counter the Applicant's assessment conclusions. We

⁴⁵ Ministry of Housing, Communities and Local Government (2025) *National Planning Policy Framework: draft text for consultation*

⁴⁶ Civil Aviation Authority (2010) *CAP 793: Safe Operating Practices at Unlicensed Aerodromes*

continue to engage with parties to collaborate on these outstanding matters as demonstrated within relevant Statements of Common Ground, but seek to focus on the consideration of alternative, reasonable mitigations to substantive design-changes to address residual impacts, as appropriate (see **8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [REP1-103]**, **8.3.36 Draft Statement of Common Ground – Priory Farm Airfield [REP1-104]**, and **8.3.37 Draft Statement of Common Ground – Tibenham Aerodrome [REP1-105]**).

Raydon Wings

- 3.17.7 Whilst recognising design changes implemented within the proposed Project alignment in the vicinity of Raydon Wings (see **7.21 2024 – Design Development Report for the Project [APP-359]**), the AAT raised residual concerns regarding assurance of the aerodrome’s future, citing that this was due, in part, to the close proximity of the proposed Cable Sealing End (CSE) compound to the north of the aerodrome. The AAT stated: ‘an alternative location for the sealing end compound might offer greater vertical clearances by moving infrastructure away from sensitive aviation factors’. The AAT did not advise on vertical clearances to be achieved, nor distances to which the Project should be moved from the aerodrome, aside from suggesting terrain may be lower further north.
- 3.17.8 As stated within paragraph 15.4.15 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]**, the Applicant’s impact assessment conclusions included that, whilst the proposed Project will represent a new obstacle in the vicinity of Raydon Wings (and a minor penetration of the Inner Horizontal Surface is recognised as a result), existing circuits can continue to be used safely, including to the north, overflying the overhead line at a safe height from which there would be a range of alternative landing sites in the event of an emergency. Table A15.2.9 within **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** does not include take-off and landing clearances assessments, recognising the overhead line position does not infringe climb or approach areas. It should be noted that the CSE compound in its proposed position does not infringe any defined Obstacle Limitation Surfaces for Raydon Wings aerodrome. Flight paths are therefore not obstructed by the compound.
- 3.17.9 **5.15 Design Development Report [APP-122]** reflects the in-depth consideration of CSE compound re-positioning, responding to feedback regarding potential effects on a range of receptors, including residential properties to the north, as well as the aerodrome to the south. As a result of this multi-faceted consideration, and in the absence of alternative, quantified impacts assessment or evidence of unacceptable risk or harm to continuing aviation operations, further changes to the CSE compound location have not been justified and taken forward. Assessed adverse effects on Raydon Wings aerodrome are summarised within **6.15 Environmental Statement Chapter 15 – Socio-economics Recreation and Tourism [APP-265]** with residual effects assessed to be temporary, short-term, minor adverse and not significant during construction, and permanent, long-term, negligible and not significant during the Project’s operation (and maintenance). **8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [REP1-103]** records the Applicant’s position that it remains willing to explore adjustments to the proposed underground cable route within the limits of deviation to minimise disruption during its construction.

Priory Farm

- 3.17.10 The AAT's 2024 statutory consultation representation and its 2025 Position Statement recognise the close proximity of Priory Farm and Tibenham aerodromes, and their interlinked potential impacts as a result. They focus on concerns that, due to proximity to the Project, aircraft overflight of the overhead line as part of the Priory Farm circuit patterns to the west of the aerodrome will be at low height and speed, and mention student pilots as part of this concern. The AAT makes clear its view that the circuit pattern cannot be changed to an easterly direction due to Tibenham's proximity.
- 3.17.11 The Applicant's impact assessment, as summarised within Table A15.2.8 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]**, reflects account taken of Priory Farm's published circuits, recognising that the overhead line generally runs parallel to the runway. Whilst it acknowledges that maintaining the existing circuits would involve overhead line overflight, this is assessed to be from a safe height, in accordance with normal practices. Furthermore, it is assessed that the position of the Project alignment will have minimal impact on aircraft returning to the airfield in an emergency. Deconfliction of interactions in flight procedures between Priory Farm and Tibenham was considered within the assessment, but we suggest this is a moot point in view of the conclusion Priory Farm circuit patterns need not change. The Applicant's impact assessment methodology does not consider students differently to qualified pilots, recognising the authority of an instructor as the pilot in command to ensure flight safety.
- 3.17.12 As stated within **8.3.36 Draft Statement of Common Ground – Priory Farm Airfield [REP1-104]**, in view of the assessment conclusions, changes to the Project design have not been implemented as they are not considered to be appropriately justified by potential adverse impacts on the operation and safety of the aerodrome. The Applicant has sought Operator agreement of impact assessment conclusions and risk acceptability, and offered collaboration to implement alternative mitigations to design changes to reduce residual risk.

Tibenham

- 3.17.13 The AAT's most recent position regarding Tibenham aerodrome is described in relation to its importance as a gliding site, with concerns raised that Applicant impact assessments are overly focused on glider tow aircraft performance to enable clearance of the Project overhead line on take-off, as well as concerns gliders returning to the aerodrome from the west would also face clearance challenges. The AAT response advises for the impact of multiple variables to be considered, including meteorological conditions and glider energy management practices, and reflects that these have the potential to impact competition flying at Tibenham. The response offered no advice on how the specified variables can be assessed to inform development of the Project design. It is understood this comment relates to the AAT's concerns raised at statutory consultation that operations on Tibenham's Runway 08/26 could cease entirely as a consequence of the Project's proximity, forcing departures and arrivals within a north to south corridor between an existing overhead line and the proposed Project overhead line.
- 3.17.14 The Applicant impact assessment as summarised within Table A15.2.11 of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]** does focus on overflight clearances, considering a range of glider and powered aircraft types (including aerotows) as appropriate for the aerodrome, with related

conclusions that clearance margins are adequate in terms of safety, including for Runway 08/26, enabling its use to continue. Current British Gliding Association (BGA) guidance⁴⁷ in relation to returning gliders recommends pilot allowance for error and changing environmental conditions, with arrival at the destination aerodrome at a reasonable height to enable safe landing, and this has been taken into account, recognising that aircraft arriving at the aerodrome boundary at the advised heights would be higher at earlier points on their flight paths, including when overflying the overhead line.

- 3.17.15 **8.3.37 Draft Statement of Common Ground – Tibenham Aerodrome [REP1-105]** demonstrates the Applicant has sought to collaborate with the Operator, as well as the CAA AAT and the BGA, to establish what they would consider to be acceptable overhead line clearances, including for gliding and towing aircraft on take-off, and in relation to competition finishes, to establish agreed thresholds and enable objective assessment. Meanwhile, the Applicant has quantified the extent of potential impacts and concluded design changes to the proposed alignment cannot be justified by this evidence. Collaboration in relation to the exploration of alternative mitigations has been offered, including support to the Operator’s consideration of reasonable changes to operational procedures (during competitions, for example) or implementation of measures to enhance pilot awareness.

3.18 Draft Development Consent Order, Requirements and Management Plans

Local Authority Positions

- 3.18.1 All Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 3.18 Draft Development Consent Order, Requirements and Management Plans - Local Impact Report coverage

Local Authority	Paragraph(s) covering this topic
Norfolk County Council	6.22-6.27, 9.5-9.10, 10.13-10.16, 11.23-11.32 12.7-12.9, 13.14, Appendix A
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	7.69-7.78, 10.87, 11.54-11.58, 14.43-14.68, 16.30, 17.86-17.87
Essex County Council	2.5.12, 4.4.4-4.4.7, 4.4.29-4.4.32, 4.8.23, 5.1.5, 5.7.1-5.7.49, 6.22.3-6.22.4
Thurrock Council	6.8.33-6.8.35, 6.12.19, 6.14.25, Appendix A
South Norfolk District Council	8.5.1-8.5.2, 8.5.5, 9.2.1-9.2.3, 9.5.1-9.5.2
Tendring District Council	13.8-13.9, 13.27, 15.17-15.21
Colchester City Council	Pages 210-216
Braintree District Council	8.8.2, 10.9.2, 16.2.39-16.2.62
Chelmsford City Council	8.161-8.162, 10.5, 10.11-10.27
Brentwood Borough Council	6.38, 6.45-6.46, 9.1-9.11

⁴⁷ British Gliding Association (2024) *Managing Flying Risk – Flying in Gliding Competitions*

The Applicant's Position

- 3.18.2 **3.1 Draft Development Consent Order [APP-056]** includes a number of control plans, secured by requirements. LIR comments which have been received in relation to the draft Development Consent Order, requirements and management plans have been identified and are addressed within this section. Where comments are specific to the contents of the plans themselves, or are a request for additional plans and information, the Applicant's position is set out against the relevant topic and is cross referenced here. Requirements are only referenced if comments have been received.

Register of Requirements

- 3.18.3 It has been requested by Brentwood Borough Council and Essex County Council that the Applicant maintains a 'Register of Requirements' such as that seen in the Lower Thames Crossing Development Consent Order to ensure ongoing fairness, public confidence and transparency. The Register of Requirements referred to in The A122 (Lower Thames Crossing) Development Consent Order 2025 relates to a tracker of Requirements that need to be discharged by the Secretary of State. At present, there are no Requirements proposed to be discharged by the Secretary of State. Each authority should maintain a register of Development Consent Order Requirement discharge applications, as it would for planning condition discharge applications. Therefore, the Applicant does not consider it necessary or proportionate for it to maintain a composite public Register of Requirements.

Requirement 1 Interpretation

- 3.18.4 Clarifications on the interpretation of 'discharging authority', and 'reinstatement planting' have been requested in Norfolk County Council and Essex County Council LIRs.

Discharging Authority

- 3.18.5 The definition of 'discharging authority' included in Schedule 3 to the **3.1 Draft Development Consent Order [APP-056]** (draft DCO) is deliberately drafted so as not to name specific authorities or bodies, noting the different geographies and authorities involved in the Project. The adopted approach is well preceded by other DCOs. However, the Applicant recognises that certainty is required by all parties over which bodies are defined as a discharging authority. We will therefore seek to work with local authorities to consider further how responsibility for discharge of requirements between different bodies can be clarified. We will also review the definitions used in the draft DCO to check whether any amendments can be made to ensure any greater clarity in the updated DCO at Deadline 3.

Reinstatement Planting

- 3.18.6 A request was made for the definition of 'reinstatement planting' to distinguish between replacement planting and what constitutes mitigation and compensation planting. The Applicant does not agree that there is any need for terms to be distinguished within the definition of reinstatement, as the definition already refers back to **7.4 Outline Landscape and Ecological Management Plan [Revision C]** (or to the final Landscape and Ecological Management Plan) where necessary terms are explained. The definition mirrors the definition in The National Grid (Bramford to Twinstead Reinforcement) Order 2024.

Requirement 3 Stages of Authorised Development

- 3.18.7 Requirement 3(1) states that ‘written notice setting out the anticipated programme for the carrying out of pre-commencement operations must be given to the relevant planning authority no less than seven days prior to the date on which those pre-commencement operations are first carried out’. Within the Suffolk County Council and Babergh and Mid Suffolk joint LIR and the Essex County Council LIR it was requested that a phasing programme for the entire Project be submitted prior to the commencement of any works. Given the programme to which the Project has to be delivered, a requirement of a phasing programme for the entire Project before the carrying out of any pre-commencement operations would be disproportionate and could frustrate the delivery. It was also raised that the seven-day notification period is insufficient, and it is requested that this be extended to 35 days. The Applicant notes that the obligation is to provide a notification only and, therefore, there is no requirement for the relevant authority to take any further action or other positive step(s) within those seven days. As a consequence, it is unclear what further utility would be served by increasing that period to 35 days.
- 3.18.8 Requirement 3(2) states that ‘the authorised development may not commence until a written scheme setting out all stages of the authorised development has been submitted to the relevant planning authority’. A request has been made to change the wording so that the written scheme is required to be ‘approved by’ rather than ‘submitted to’ the Local Planning Authority. The Applicant is content to submit the written scheme to the authorities for their information, as set out in **3.1 Draft Development Consent Order [APP-056]**. However, given the scale of the Project, the large number of local authorities within the Order Limits and the complexities of delivering such a large project within a limited timeframe, it is not appropriate or proportionate for the Applicant to seek each authority’s consent to the written scheme setting out the stages of the authorised development. Additionally, there are specialist technical considerations involved, and the Applicant and the Main Works Contractor(s) have the necessary expertise to determine the appropriate stages and programming of the authorised development. Submitting these for approval could severely delay the Applicant’s ability to begin construction of the development and to achieve energisation by 2030.
- 3.18.9 Requirement 3(4) states that ‘*Written notice of the commencement and completion of construction of each stage of the authorised development, and the operational use of each stage of the authorised development, must be given to the relevant planning authority within 28 days of the relevant event occurring*’. Comments in the LIRs have expressed concern that 28 days is excessive. The Applicant acknowledges this point and will consider whether revised drafting can be included in a future iteration of **3.1 Draft Development Consent Order [APP-056]**.

Requirement 4 Construction Management Plans

- 3.18.10 South Norfolk District Council made a request for the management plans listed in Requirement 4, (a) the code of construction practice, (b) the construction traffic management plan, (c) the landscape and ecological management plan, and (d) the public rights of way management plan, to be secured via individual requirements with adequate parameters to ensure that which is proposed is delivered with only scope for minor inconsequential variations.

- 3.18.11 Requirement 4 of **3.1 Draft Development Consent Order [APP-056]** requires final plans to be substantially in accordance with the outline plans, which limits the scope for the Applicant to make anything more than minor variations. The Applicant is however committed to agreeing clear and pragmatic ways of working with host authorities in relation to the discharge of Requirements to minimise full re-submissions for minor inconsequential variations. The Applicant will continue to engage with host authorities and statutory consultees throughout the Examination to refine this approach and will maintain constructive engagement post-consent to support timely and effective discharge. The Applicant does not consider it necessary to have separate Requirements for each of the management plans. Each management plan is defined in **3.1 Draft Development Consent Order [APP-056]**, the definition of which includes any appendices, capturing for example the environmental control plans appended to **7.2 Outline Code of Construction Practice [Revision B]** such as **7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [APP-302]**. This ensures that the plan, when finalised and approved, incorporates all relevant implementation detail and supporting material and must be complied with in full. The Requirement drafting therefore provides a clear legal mechanism to secure the delivery of what is proposed, with no scope for material deviation beyond that which has been assessed.
- 3.18.12 It was also raised in the Essex County Council LIR that reference is made to Natural England being consulted on the landscape and ecological management plan in Paragraph 4(1), however, other than the Local Planning Authority, no other stakeholders are listed in this requirement who should be engaged in consultation on the management plans. The outline management plans have been developed in consultation with a range of stakeholders, including local highway authorities and National Highways. Relevant stakeholders will be engaged with on the development of the final versions of management plans and as part of our ongoing engagement with stakeholders we will review if others wish to be listed as consultees within this requirement.

Requirement 5 Archaeology

- 3.18.13 Requirement 5 (4) of **3.1 Draft Development Consent Order [APP-056]** states that “*pre-commencement operations must be carried out in accordance with the outline archaeological mitigation strategy and outline written scheme of investigation, unless otherwise agreed with the relevant planning authority and, if relevant, Historic England*”. Essex County Council requested that this be changed so that intrusive site preparations cannot take place until an archaeological or geoarchaeological written scheme of investigation has been submitted and approved. The Applicant considers that the outline management plans provide effective control over all pre-commencement works and operations, noting that the approach mirrors that adopted on other recent projects, including the Bramford to Twinstead project.
- 3.18.14 It was also noted in Essex County Council LIR and Suffolk County Council and Babergh and Mid Suffolk joint LIR that Requirement 5 does not secure full post-excavation analysis, timely publication, and deposit of complete physical and digital archives. **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** provides detailed information on the reporting and publication process to be undertaken following the completion of fieldwork. This includes interim statements within six weeks of completing fieldwork at each site which will set out a programme of work and schedule for the completion of the Post-

Excavation Assessment Report. The preparation of the Project archive, post-excavation assessment and subsequent analysis and publication phases would be undertaken in accordance with the DWSI(s), Historic England guidelines (Historic England, 2016a), and ClfA guidelines (ClfA 2014b; 2020; 2023a-f) and other relevant archaeological standards and national guidelines. The different phases would be completed within a set time frame following completion of fieldwork, as agreed between the Archaeological Contractor(s) and the National Grid in consultation with relevant Local Planning Authority Archaeological Advisors and, if relevant, Historic England. The measures within **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** are secured by Requirement 5 of **3.1 Draft Development Consent Order [APP-056]**. The Applicant therefore does not consider it necessary to amend Requirement 5 to include post-excavation works.

Requirement 6 Design and Layout Plans

- 3.18.15 It was raised in Essex County Council, Thurrock Council and Braintree District Council LIRs that the wording ‘in general accordance’ is too permissive and should be expressly limited to de minimis variations only.
- 3.18.16 The wording proposed has been selected to reflect the scale of the Project, the level of detailed design at the time, and to ensure sufficient flexibility in design to respond to such final design proposals as will be agreed with the relevant authority as prescribed in **3.1 Draft Development Consent Order [APP-056]**. As part of the process, the authority will be able to form a view as to whether any proposals submitted for approval will give rise to any materially new or different environmental effects beyond those identified in the Environmental Statement and the extent to which any effects are acceptable within the terms of **3.1 Draft Development Consent Order [APP-056]**.

Requirement 7 Construction Hours

General Concerns

- 3.18.17 Eight LIRs raise concern that the proposed construction working hours are excessive and will not allow for respite for communities due to noise and vibration from construction activities, and request that a communication and engagement strategy be produced. Concern was also raised on the impact to ecology from extended working hours. This point has been addressed in the Biodiversity, Ecology and Nature Conservation (Ecology and Biodiversity) section in Chapter 4 of this document.
- 3.18.18 The proposed construction core working hours (unless otherwise approved by the Local Planning Authority) are:
- Monday – Friday: 07:00 to 19:00
 - Saturday, Sunday and bank holidays/public holidays: 07:00 to 17:00.
- 3.18.19 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]**.

- 3.18.20 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.
- 3.18.21 The construction working hours set out in **3.1 Draft Development Consent Order [APP-056]** define the maximum permissible envelope within which works may take place and do not indicate that construction would occur continuously or routinely throughout those hours. It is not typical for construction activities to take place across the full duration of the permitted working day, nor on every day within the defined hours. The inclusion of these hours provides flexibility to manage construction sequencing and programme resilience, including accommodating weather-related disruption, land access constraints, ground conditions and outage requirements associated with electricity transmission projects, while ensuring that works can be completed or secured safely. All construction activity remains subject to the controls set out in **7.2 Outline Code of Construction Practice [Revision B]**.
- 3.18.22 The inclusion of Sundays and bank holidays within the defined core working hours provides 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 and avoiding a prolonged overall construction period, which would itself result in longer-term exposure to construction impacts. A blanket prohibition on Sundays / bank holidays would materially harm the deliverability of this critical national priority project.
- 3.18.23 The assessment within **Volume 6: Environmental Statement** is based on a set of parameters, including the core working hours for the construction phase of the Project.
- 3.18.24 **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** assessed the impact to sensitive receptors from noise and vibration during the construction phase. The assessment concluded that with the embedded mitigation and controls set out in **7.2 Outline Code of Construction Practice [Revision B]**, significant effects from noise and vibration during the construction phase are not anticipated. **7.2 Outline Code of Construction Practice [Revision B]** sets out noise and vibration limits, monitoring protocols, and reporting requirements for all construction activities to minimise adverse impacts during the construction phase.
- 3.18.25 **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305]** sets out the communications channels and approach to community engagement during the construction of the Project. A community relations team will be appointed to engage with local residents and provide dedicated community relations and external communications support. For any questions or concerns during the construction phase, residents and stakeholders can contact the community relations team via a range of contact methods. The measures set out within **7.2 Outline Code of Construction Practice [Revision B]** will be secured via Requirement 4(a) (Construction Management Plans) of **3.1 Draft Development Consent Order [APP-056]** within the final Code of Construction Practice.

- 3.18.26 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 controls to manage impacts included in Table 6.1 of **7.2 Outline Code of Construction Practice [Revision B]**, 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).

Activities Outside Core Working Hours

- 3.18.27 Justification for the operations listed in Requirement 7(4) which are permitted to take place outside core working hours, was requested. Suffolk County Council and Babergh and Mid Suffolk joint LIR also requested that the wording in Requirement 7 (2) be amended to restrict HGV movements to the core hours only.
- 3.18.28 **3.1 Draft Development Consent Order [APP-056]** permits a limited range of activities to take place outside the core working hours where this is necessary to ensure public safety, engineering integrity, network reliability, or compliance with third-party requirements, and to minimise overall disruption. The activities identified are not routine construction works but are those that are time critical, continuous once commenced, or externally constrained, such that restricting them to core hours would increase risk or prolong impacts. Trenchless crossings, underground cable jointing, oil processing of transformers, and certain commissioning activities may need to proceed without interruption to avoid safety, environmental, or asset integrity risks. Works affecting highways, railways and watercourses, including conductor installation and the delivery of abnormal indivisible loads, are often governed by requirements of highway authorities, asset owners or the police, and are therefore routinely scheduled at night or weekends to maintain safety and reduce disruption. Provision is also made for the continuation of works to a safe stopping point, the completion of works delayed by severe weather, emergency activities, security monitoring, and necessary survey works. Mechanical and electrical installation works undertaken within completed and enclosed buildings are expected to result in minimal external effects and can proceed outside core hours without significant effects on nearby receptors.
- 3.18.29 Requirement 7(2) states that “no percussive piling works may take place outside of the hours of 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays, unless otherwise approved by the relevant planning authority”. It was requested that this be amended to remove the word ‘percussive’ so that no piling may take place outside of the hours stated. The Applicant is considering this request and will provide a response at a future deadline.
- 3.18.30 **3.1 Draft Development Consent Order [APP-056]** stipulates that HGV deliveries are not allowed to arrive before 07:00 or depart after 19:00 on weekdays, or before 07:00 or after 17:00 at weekends and on Bank Holidays with the exception for specific activities outlined in Requirement 7 sub paragraphs (4) and (5), or if approved by the relevant highway authority. A request was made in an LIR for the wording be altered to HGV movements to clearly include trips that are not deliveries such as removal of spoil from site. This comment is addressed in the Traffic and Transport section in Chapter 4 of this document. HGV movements associated with the Project will be constrained to the working hours unless otherwise agreed with the Local Highway Authority. There are a number of operations which may take place outside of core working hours (paragraph 2.3.3 of **7.3 Outline Construction Traffic**

Management Plan [APP-309]) which are not expected to have a large number of HGV trips associated.

- 3.18.31 Importantly, any activities undertaken outside core construction hours remain subject to the controls and mitigation measures set out in **7.2 Outline Code of Construction Practice [Revision B]** and **7.3 Outline Construction Traffic Management Plan [APP-309]**. These controls include provisions relating to noise management, lighting, environmental protection and monitoring, and construction traffic, ensuring that any out-of-hours activity is appropriately managed and minimised. These measures will be secured via Requirement 4(1)(a) (Construction Management Plans) of **3.1 Draft Development Consent Order [APP-056]**.

Start Up and Close Down Activities

- 3.18.32 Requests have been made for start-up and close-down activities to be included within the core working hours, clarification on the level of potential noise generated by start-up and close down activities, and for a noise limit to be applied to these activities.
- 3.18.33 **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** assessed the impact to sensitive receptors from noise and vibration during the construction phase, and based the assessment on the core working hours proposed, which would include start-up and close-down activities taking place up to one hour either side of the core hours, and activities which can take place outside the core working hours. The assessment concluded that with the embedded mitigation and controls set out in **7.2 Outline Code of Construction Practice [Revision B]**, significant effects from noise and vibration during the construction phase are not anticipated. The measures set out therein will be secured via Requirement 4(a) (Construction Management Plans) of **3.1 Draft Development Consent Order [APP-056]** within the final Code of Construction Practice.
- 3.18.34 The Applicant therefore considers the provision for start-up and close-down activities and activities that can commence outside core working hours to be proportionate, justified, and consistent with established practice for Nationally Significant Infrastructure Projects, noting that all such activities remain subject to the application of best practicable means and appropriate mitigation to manage noise and other environmental effects as set out in **7.2 Outline Code of Construction Practice [Revision B]**.
- 3.18.35 There are no statutory noise limits for construction noise. However, works during any period would be subject to assessment against the applicable construction noise threshold for potential significant effects for that period, as per the 'ABC' method described in Annex E.3.2 of BS 5228-1:2009+A1:2014 – Part 1: Noise⁴⁸, and as detailed in Section 4 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. The Main Works Contractor(s) will identify and implement specific mitigation measures for all construction works, including start-up and close-down activities, in consideration of these thresholds to avoid significant adverse effects and reduce adverse effects.

⁴⁸ British Standards Institute (2014) BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise

Requirement 8 Retention and Removal of Trees, Woodland and Hedgerows

- 3.18.36 Braintree District Council questioned whether the level of detail to be provided under Requirement 8 would provide sufficient safeguards for the retention of trees and hedgerows. The Applicant is satisfied that the requirement wording provides sufficient information to enable the Local Planning Authority to understand the level of protection to be provided.
- 3.18.37 **6.13.A6 Environmental Statement Appendix 13.6: Arboricultural Impact Assessment [APP-236]** makes reference to tree protection measures in section 13.1.7 and signposts the reader to **7.4 Outline Landscape and Environmental Management Plan [Revision C]** for further information. Section 7 therein makes reference to the production of an Arboricultural Method Statement following detailed design and to be agreed with the relevant Local Planning Authorities prior to construction activity commencing. This is also referenced in Section 13.4.14 of **6.13.A6 Environmental Statement Appendix 13.6: Arboricultural Impact Assessment [APP-236]**. Commitment reference B13 in **7.4 Outline Landscape and Environmental Management Plan [Revision C]** states a tree survey will inform construction exclusion zones (informed by root protection areas) as a result of any changes to the baseline.

Requirement 9 Reinstatement Planting Plan

- 3.18.38 Essex County Council and Thurrock Council commented on the time period proposed to monitor and replace tree and hedgerow planting.
- 3.18.39 The Applicant considers the five-year monitoring period for tree and hedgerow replacement planting is sufficient to ensure successful establishment and is in line with other recent Nationally Significant Infrastructure Projects including The National Grid (Bramford to Twinstead Reinforcement) Order 2024 and The National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. The monitoring period is adaptive, as stated within **7.4 Outline Landscape and Ecological Management Plan [Revision C]** which includes like-for-like replacement or consideration of alternative species based on site-by-site conditions and the reasons for failure. The Applicant considers this approach to be in accordance with Requirement 9(7) (reinstatement planting plan) of **3.1 Draft Development Consent Order [APP-056]** which secures the replacement of any trees or hedgerows planted as part of an approved reinstatement planting plan that, within a period of five years after planting, are removed, die or become seriously damaged or diseased.
- 3.18.40 The Applicant notes that a 10-year aftercare and replacement period is not standard practice for reinstatement planting along linear DCOs or planning permissions, where a five-year establishment and replacement period is typically applied and is widely accepted as sufficient to secure successful establishment.
- 3.18.41 The five-year period only relates to areas that are to be returned to landowners. The Applicant has committed to a 30-year aftercare period at Environmental Areas in line with the commitments made within **7.1 Biodiversity Net Gain Report [APP-299]**. However, the Applicant maintains its position that as Biodiversity Net Gain (BNG) is not mandatory for Nationally Significant Infrastructure Projects, there is no basis upon which to include reference to this aftercare period within the requirement.

- 3.18.42 With regard to the comment received concerning early planting, the requirement does reference that reinstatement planting must be undertaken at the earliest opportunity and no later than the first planting season after that part of the authorised development is brought into use.

Requirement 10 Reinstatement Schemes

- 3.18.43 Essex County Council and Thurrock Council and Braintree District Council made comments on the rationale for the 21-month period, for not reinstating within 10 m of the underground cables and also that reference should be made within the requirement wording to the reinstatement of land used for haul roads.
- 3.18.44 The 21-month period provided to undertake the reinstatement of land links to the time period in Article 27 (Temporary use of land by National Grid) and Article 28 (Temporary use of land by UKPN) of **3.1 Draft Development Consent Order [APP-056]**, in which the undertaker is not permitted to remain in possession of the land without the consent of the owners after the end of a period of 21 months.
- 3.18.45 Concerning reinstatement, the rationale for not reinstating to a condition suitable for its former use within 10m of the underground cables provides the Applicant with the safeguard necessary to ensure that such a use would not subsequently damage the cable.
- 3.18.46 Reference within the requirement to 'and used temporarily for construction' implicitly includes for land used for temporary haul roads and therefore specific mention of haul roads within the requirement is considered to be not necessary.

Requirement 11 Approval of Details Having Regard to the Design Approach for Site Specific Infrastructure

- 3.18.47 See response to requirement 6 on the issue of 'general accordance'.

Requirement 12 Design of Permanent Buildings

- 3.18.48 See response to requirement 6 on the issue of 'general accordance'.

Requirement 13 Decommissioning

- 3.18.49 Essex County Council sought more detail on the decommissioning process, particularly the potential for impacts upon communities and the local environment when responding to this requirement. Section 4.11 of **6.4 Environmental Statement Chapter 4 Project Description [APP-130]** explains the Applicant's intentions regarding decommissioning and confirms that it has no specific plans to decommission the Project. It notes that decommissioning was scoped out of the Environmental Statement as per **6.20 Scoping Opinion [APP-297]** but provides a summary of the works required to decommission and a summary of the likely environmental effects within Tables 4.11 and 4.12 respectively. Requirement 13 provides for the preparation of a written scheme of decommissioning and an environmental assessment undertaken in accordance with the laws and regulations applicable at that time for submission to and approval by the Local Planning Authority.

Requirement 14 Control of Development Under Works Nos. 19 and 21 to 24

- 3.18.50 Whilst no comments were received on this requirement, the Applicant can reconfirm that it proposes to progress with Scenario B for completing the Project's electrical connection to Tilbury North substation. As a result of this decision, the Applicant is required to make consequential changes and updates to a number of application documents. The Applicant intends to submit the suite of updated documents at Deadline 5 (10 June 2026). The Applicant also intends to use this deadline to submit any other changes and updates to application documents following progress on other scenario decisions set out in the scenarios tracker.

Requests for Additional Requirements

- 3.18.51 Several LIRs include requests for additional requirements for control documents. The Applicant's responses to a number of these requests can be found within other sections of this document and the relevant cross-reference is provided below.

Biodiversity Net Gain (BNG) and Ecological Clerk of Works (ECoW)

- 3.18.52 Requests by Chelmsford County Council, Brentwood Borough Council, Essex County Council and Colchester City Council to include a requirement to secure biodiversity net gain have been made. The Applicant's response to this request, and how it sees the status of BNG in the context of this application, is provided in the Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain section in Chapter 3 of this document. In summary, on-site BNG will be secured via the implementation of the final version of **7.4 Outline Landscape and Ecological Management Plan [APP-321]** whilst off-site delivery will be secured through the form of a unilateral undertaking.
- 3.18.53 Braintree requested that a post-consent programme of ecological mitigation, including Ecological Clerk of Works (ECoW) oversight is secured via a requirement. The programme of ecological mitigation is set out within **7.4 Outline Landscape and Ecological Management Plan [APP-321]** and commitment GG04 in **7.2 Outline Code of Construction Practice [Revision B]** secures an ECoW who will monitor that the works proceed in accordance with relevant environmental DCO requirements and adhere to the required good practice and standard mitigation measures. The outline management plans are secured by Requirement 4 (management plans) of **3.1 Draft Development Consent Order [APP-056]**.

Developer's Forum and Co-ordination Including Energy Infrastructure Plan

- 3.18.54 Essex County Council, South Norfolk District Council, Tendring District Council and Colchester City Council had concern about the cumulative effects of the project with other NSIPs and other major infrastructure projects and requested that cross project co-ordination is secured as a requirement. It is asked that a Developer's Forum is set up to facilitate collaboration and information sharing across developers to address cumulative effects, and to co-ordinate construction and operation details such as construction programmes, mitigation and the management and maintenance of shared infrastructure. It was also requested that the Applicant produce an area wide Energy Infrastructure Plan to coordinate the implementation and mitigation of multiple large-scale energy projects to minimise cumulative impacts. The Applicant is already

engaged with other developers, however we will consider the request for a Developer's Forum and engage with the local authorities accordingly.

HGV Parking

- 3.18.55 Essex County Council raised the issue of Heavy Goods Vehicle parking during construction and have sought either a requirement or amendment to the relevant control document to include parking usage surveys to be undertaken with mitigation applied if necessary. The Applicant's position on this matter is set out in the Traffic and Transport section in Chapter 4 of this document which refers back to the response provided to the Council's relevant representation and to the preparation of a final CTMP as the relevant control document.

Employment, Education, Skills and Supply Chain

- 3.18.56 The Applicant now proposes to prepare and submit an Employment and Skills Plan. This document is intended to provide transparency and clarity regarding the approach that National Grid and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project. Further information on this is provided in the Socio-economics, Recreation and Tourism - Employment, Skills, Training and Local Supply Chain section in Chapter 3 of this document. The commitment to implementing the project in accordance with an Employment and Skills Plan will be secured by way of a DCO Requirement to be added into the Draft DCO. The Applicant will consider the drafting of this requirement and add the wording into the Draft DCO in due course.

Health and Wellbeing Mitigation Strategy and Monitoring Framework

- 3.18.57 Essex County Council and Tendring District Council has requested that a Health and Wellbeing mitigation strategy and monitoring framework be secured within the DCO. The Applicant's position on this matter is set out in the Health and Wellbeing section in Chapter 4 of this document. Mitigation measures for health and wellbeing will be secured via Requirement 7 (management plans) of **3.1 Draft Development Consent Order [APP-056]**, and there is no requirement for monitoring measures for health and wellbeing because no significant effects have been identified in the assessment undertaken in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]**.

Integrated Green Infrastructure Strategy

- 3.18.58 Essex County Council requested the inclusion of a requirement for a Green Infrastructure Strategy or Landscape Strategy to demonstrate integration of habitat connectivity, sustainable drainage and climate resilience. The Applicant supports the delivery of Environmental Net Gain including Green Infrastructure (see the Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain section in Chapter 3 of this document) and will consider whether there are any opportunities to deliver under enhancement.

Monitoring and Reporting on BNG and Green Infrastructure Delivery

- 3.18.59 Linked with the above, Essex County Council has sought the addition of a requirement to monitor and report on BNG and Green Infrastructure delivery. **7.1 Biodiversity Net Gain Report [APP-299]** includes a commitment to undertake monitoring for a period of 30 years with details to be set out in a habitat management

and monitoring plan. **7.4 Outline Landscape and Ecological Management Plan [APP-321]** also provides for monitoring.

Surface Water Drainage

- 3.18.60 Requests in the Norfolk County Council LIR, the Suffolk County Council and Babergh and Mid Suffolk joint LIR, Thurrock Council LIR, and South Norfolk District Council LIR are made for the preparation of a surface water drainage or management plan. Commitment GG22 in **7.2 Outline Code of Construction Practice [Revision B]** secures that the Main Works Contractor(s) would prepare a Surface Water Management Plan. This plan would be substantially in accordance with **8.2 Drainage Strategy DCO [REP1-072]**, submitted at Deadline 1, and would demonstrate how runoff across construction work sites would be controlled to prevent any off-site increases in flood risk and/or pollution, including consideration of exceedance flow routes.

CEMP and Material & Waste Management Plan

- 3.18.61 Chelmsford City Council and Essex County Council requested the submission of a Construction Environmental Management Plan (CEMP) as well as a material and waste management plan. **7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [APP-302]** is provided as an appendix to **7.2 Outline Code of Construction Practice [Revision B]**. This outline document, secured via requirement 4 of **3.1 Draft Development Consent Order [APP-056]**, requires the submission of a final waste management plan for approval by the Local Planning Authority before the relevant authorised stage can commence.
- 3.18.62 **7.2 Outline Code of Construction Practice [Revision B]** includes all information that would typically be found within a CEMP, therefore the Applicant is of the opinion that a separate CEMP is not required.

Requirements to Control Lighting, Species-Specific Mitigation, Residential Amenity, Construction Compounds, Noise and Vibration Control and Fencing

- 3.18.63 Chelmsford City Council, South Norfolk District Council and Braintree District Council have identified a number of matters which they believe require control via the DCO requirements. On the matter of lighting and residential amenity and noise and vibration control, Table 6.1 of **7.2 Outline Code of Construction Practice [Revision B]** includes commitment GG26 to control and minimise construction lighting to reduce disturbance to residential and ecological receptors. On the matter of noise and vibration control, **7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP 306]** is provided as an appendix to **7.2 Outline Code of Construction Practice [Revision B]** and contains measures to control and mitigate noise and vibration during construction. Measures to mitigate other potential construction effects upon residential amenity are also set out as commitments within **7.2 Outline Code of Construction Practice [Revision B]**, for dust. **7.2 Outline Code of Construction Practice [Revision B]** is secured by Requirement 4 of the **Draft Development Consent Order [APP-056]**.
- 3.18.64 Commitment GG29 in **7.2 Outline Code of Construction Practice [Revision B]** commits to appropriate fencing. The type of fencing installed will depend on the area to be fenced and will take into consideration the level of security required in relation to the surrounding land and public access, rural or urban environment and arable or stock farming.

- 3.18.65 Given the scale and length of the Project, it would be a disproportionate administrative and practical burden on the Applicant and the relevant authority to include a requirement for discharge relating to something so specific as temporary fencing and means of enclosure.
- 3.18.66 **7.16 Design Approach for Site Specific Infrastructure [APP-354]** secures permanent fencing as hot-dipped galvanized steel palisade fencing, up to 4 metres high, with strict specifications for durability, security, and maintenance. There is no scope for variation in material or finish, and gates must match the fencing. Requirement 12 of **3.1 Draft Development Consent Order [APP-056]** ensures the Applicant must comply with **7.16 Design Approach for Site Specific Infrastructure [APP-354]** design principles and commitments when delivering permanent buildings and infrastructure, unless a formal change is agreed with the Local Planning Authority.
- 3.18.67 Development Consent Order requirements for species-specific mitigation have been raised in one LIR. Species mitigation is delivered via a suite of examination documents and through secondary consents. Documents of prime relevance include **7.2 Outline Code of Construction Practice [Revision B]** and appendices and **7.4 Outline Landscape and Ecological Management Plan [APP-321]**. The Outline Code of Construction Practice includes species-specific biodiversity commitments and is secured by Requirement 4.

Site-Specific Mitigation

- 3.18.68 Thurrock Council has sought the delivery of site-specific control documents via a DCO requirement. **3.1 Draft Development Consent Order [APP-056]** Requirement 4 requires the preparation, submission and discharge of control documents relevant to each stage of the authorised development, with the stages first provided to the Local Planning Authority prior to pre-commencement operations, via Requirement 3. The delivery of site-specific control documents is therefore secured.

Monitoring and Assessment During Construction

- 3.18.69 South Norfolk District Council requested that the DCO be amended to include explicit requirements securing baseline environmental monitoring, ongoing assessment during construction, and mandatory implementation of remedial measures where thresholds are exceeded. The Applicant does not agree that explicit requirements are required for these points. **7.2 Outline Code of Construction Practice [Revision B]** details that mitigation measures will be tracked and monitored to ensure relevant receptors do not experience significant effects. The final Code of Construction Practice will include comprehensive details regarding the monitoring procedures and reporting mechanisms to ensure that environmental monitoring is robustly implemented throughout the construction phase by the Main Works Contractor(s), with clear processes in place for identifying and addressing any issues.

Recreation and Leisure Management Plan and Active Travel

- 3.18.70 Thurrock Council has requested a Recreation and Leisure Management Plan setting out protection of parks/open spaces, event scheduling, and communications. The effects on Recreation and Leisure are set out in the **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** and all proposed mitigation measures are detailed within **7.2 Outline Code of Construction Practice [Revision B]** and in **7.6 Outline Public Rights of Way Management Plan**

[APP-329], therefore the Applicant does not consider a Recreation and Leisure Management Plan is necessary.

- 3.18.71 It was also requested in the Thurrock Council LIR that mitigation measures to protect PRowS, bridleways and Active Travel routes are secured in the DCO. Measures to protect PRowS, bridleways and Active Travel routes are set out in **7.6 Outline Public Rights of Way Management Plan [APP-329]**. The overall PRow strategy, 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. In accordance with mitigation measure GG07 in **7.2 Outline Code of Construction Practice [Revision B]**, any PRow that is affected by construction works, that has been confirmed as requiring reinstatement with the Local Highway Authority, will be reinstated prior to reopening to the reasonable satisfaction of the Local Highway Authority PRow Officer. Post-construction site condition surveys will be undertaken by the Main Works Contractor(s) after construction and reinstatement and the results of these and any remediation will be discussed with the landowner and the relevant PRow Officer, prior to handover.

Draft Development Consent Order

- 3.18.72 The following tables set out the Applicant's response to detailed comments received from the host authorities on **3.1 Draft Development Consent Order [APP-056]**. To the extent that the Applicant has responded to specific comments elsewhere in this document, in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** or elsewhere in the application or examination materials, the Applicant's response is not repeated in these tables unless the authority's comment goes beyond what has previously been said and the Applicant considers further clarification is required, or new or additional points have been raised.

Braintree District Council

Table 3.19 Braintree District Council – Applicant’s Response to Local Authority comments on the draft DCO

Braintree District Council’s Statement	Applicant’s Response
Some of the commitments in the Outline CoCP (e.g. GH10) include notification of the Local Planning Authority “as appropriate” as part of unexpected contamination protocols and post-consent ground investigations. Clarification of how this notification will be secured through the DCO is required. The Council also requires details on how this notification procedure will operate in practice, and what post-consent documentation the Applicant will submit in compliance with the procedures outlined in the Outline CoCP. (Para. 11.6.2)	The Applicant agrees that it is important to agree the notification process and will engage with the Councils on this point post-consent.
Subject to these matters being satisfactorily addressed and secured through robust and enforceable DCO Requirements, the Council considers that the geology and hydrogeology impacts of the proposed development are capable of being managed in accordance with national and local policy. (Para. 11.7.4)	The Applicant notes the Council’s position and considers that the controls proposed in the application documents will achieve this.
Subject to these matters being addressed and secured through clear and enforceable DCO Requirements, the Council considers that the air quality and emissions impacts of the proposed development are capable of being managed in accordance with national and local policy. (Para. 13.7.4)	The Applicant notes the Council’s position and considers that the controls proposed in the application documents will achieve this.
The Norwich to Tilbury (N2T) DCO includes a range of works excluded from the commencement of development, labelled as “Pre-commencement Operations”. The scope of these pre-commencement operations is extensive and includes multiple additional elements compared to the B2T DCO, including utilities protection works, fencing and protection slabs, temporary laydown areas, and the receipt and erection of	The Applicant has carefully considered the definition of ‘pre-commencement operations’ to ensure it is suitable for the specific circumstances of the Norwich to Tilbury Project but is considering the proposed tailpiece to that defined term and will respond at Deadline 3.

Braintree District Council's Statement	Applicant's Response
construction plant and equipment. The effect of this is to allow a wide range of not insignificant (i.e. demonstrably material/significant) works to go ahead before formal commencement of the Works which triggers associated controls linked to that milestone. The Council previously made representations to B2T to the effect that many operations, such as the establishment of construction compounds, should be excluded from the definition of pre-commencement operations. However, having regard to the precedent set in the B2T DCO, the Council requests instead that an additional tailpiece is added to the definition of pre-commencement operations: ‘except those operations which the relevant planning authority considers give rise to a materially new or different environmental effects beyond that considered in the Environmental Statement as notified to the undertaker by the relevant planning authority’ This amendment is requested to ensure adequate control over such works. (Paras 16.2.1 - 16.2.4)	
The Council requests that any supplemental Environmental Statement submitted for the purpose of discharging Requirements is added to the list of certified documents, to ensure there is a central repository for all relevant environmental material. (Para 16.2.7)	For the reasons more particularly set out on page E21 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] these proposed amendments are not appropriate or necessary.
This is a wide definition on page 7 of the N2T DCO which includes a number of operations which may be necessary in the future to maintain the authorised development for the duration of its lifetime, including use of technology. However, there is no clarity as to who determines whether there is a materially new/different impact from that described in the ES. In order to provide clarity, the last three lines of this definition should be removed and substituted by the text as follows:	For the reasons more particularly set out on page E21 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] it is not appropriate or necessary for the definition of “maintain” in the draft Development Consent Order to be amended as proposed. The question of whether works listed in that definition give rise to any materially new or materially different environmental effects to those identified in the environmental statement is, in the usual manner of development consent orders made to date, an objective test. Non-compliance with that objective test could be a breach of a term of the

Braintree District Council's Statement	Applicant's Response
“maintain” includes ... provided such works do not in the opinion of the relevant local planning authority give rise to any materially new or materially different environmental effects to those identified in the Environmental Statement, and any derivative of “maintain” must be construed accordingly; (Paras 16.2.8 – 16.2.9)	development consent order for the purposes of section 161 of the Planning Act 2008 enforceable in the usual manner.
Development consent etc. granted by the Order is set out on page 10 of the N2T DCO. The Council considers that the undertaker should be under a mandatory obligation (‘shall’ instead of ‘may’) either to complete the authorised development in full or, where the scheme is not fully completed, to decommission works and remove any obsolete structures which are no longer required for the scheme. (Paras 16.2.10 – 16.2.11)	For the reasons more particularly set out on page E21 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] in relation to comments on Article 4 (Maintenance of authorised development) these proposed amendments are not appropriate or necessary.
Article 4 (page 10 of the N2T DCO) relates to the maintenance of the authorised development. The Council request that a mandatory obligation should be added on undertaker to maintain (‘shall’ instead of ‘may’) and also to decommission and remove parts of the authorised development which become obsolete. (Paras 16.2.12 – 16.2.13)	For the reasons more particularly set out on page E21 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] these proposed amendments are not appropriate or necessary.
The Limits of Deviation (LoD) are out on page 10 of the N2T DCO. These allow for longitudinal and lateral deviation (unrestricted) within the Order Limits, as well as vertical deviation. The N2T DCO proposes a vertical deviation of 6m (excluding pylons outside the Braintree District). The explanatory memorandum sets out why flexibility across the scheme in its entirety is necessary to avoid the risk of the scheme becoming incapable of implementation due to unforeseen ground	Six metres is the same upward deviation as was allowed for in The National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024, and is intended to provide a necessary but proportionate degree of flexibility in the construction of the authorised development and to reduce risk. It allows the addition of two standard pylon sections, each measuring three metres in height. The limits of deviation have been assessed in the Environmental Statement submitted with the application for development consent [APP-123 to APP-298].

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conditions or engineering considerations. This is accepted in principle by the Council. However, the limits set by the LoD have potentially significant implications for landscape and visual impacts, heritage impacts and noise, as discussed in the relevant chapters of this LIR, particularly where the equipment is to be both re-sited laterally within relevant LOD, in combination with being taller than originally conceived. The Council consider that a vertical deviation of 6m is too high and unjustified. This should be amended to a maximum of 4m high, consistent with the B2T DCO (Article 5), to minimise environmental impacts. (Paras 16.2.14 – 16.2.18)	
This provision [Article 14 (Power to alter layout etc of streets)] is set out on page 17 of the N2T DCO. The Council request notification as relevant planning authority in relation to such works. (Paras 16.2.19 – 16.2.20)	For the reasons more particularly set out on page E21 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] these proposed amendments are not appropriate or necessary.
This provision [Article 17 – Access to Works] can be found on page 19 of the N2T DCO. The Council request notification as the relevant planning authority in relation to such works, as a minimum; preferably the Council as relevant planning authority would like to be consulted by the relevant street authority before a decision is made under this provision and for the time for deemed consent to be extended to (at least) 35 days, all in line with B2T DCO (Art 16). (Paras 16.2.21 – 16.2.22)	For the reasons more particularly set out on page E21 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] these proposed amendments are not appropriate or necessary.
This article [Article 20 – Discharge of Water] sets out the circumstances in which the Applicant can discharge into a sewer/watercourse and is found on page 20 of the N2T DCO. The Council consider that deemed consent should be issued after 35 days as per B2T DCO (page 19) to allow more time for affected parties to respond.	For the reasons more particularly set out on page E21 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] these proposed amendments are not appropriate or necessary.

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(Paras 16.2.23 – 16.2.24) This article [Article 21 – Protective Works] can be found on pages 21-23 of the N2T DCO. This provision authorises protective works inside/outside the order limits as appropriate. The Council requests that the relevant planning authority is consulted where any protective works outside the Order Limits are proposed, in case these result in any development for which planning permission is required. (Paras 16.2.25 – 16.2.26)	For the reasons more particularly set out on page E22 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] these proposed amendments are not appropriate or necessary.
This article [Article 50 – Felling and Lopping of Trees] appears on page 46 of the N2T DCO. This provision allows for wide powers to do the tree work which the undertaker reasonably believes to be necessary. This wording is similar to that of the wording in Article 47 of the B2T DCO, except that the time limit for deemed consent from the relevant highway authority in relation to tree works in the highway at Art 50(5) should be amended to (35) days in line with B2T. During the B2T examination, the Council raised concerns regarding the phrases “overhanging” and “near”, which are vague and lack certainty. Despite this, the wording was retained in the B2T DCO (Art 47). Rather than re-argue this point, the Council requests advance notice of any tree works proposed outside the Order Limits and that the consent of the relevant planning authority is required prior to such works, with deemed consent to be given after (35) days, in line with B2T to enable the opportunity for appropriate controls / conditions to be imposed in relation to such works for the better amenity of the wider area. This is particularly important owing to the Council's experiences on B2T (as set out in Paragraph 9.6.2 of this LIR).	For the reasons more particularly set out on page E22 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] the proposed amendments (in relation to local authority notice and consent or amendments to the terms “overhanging” and “near”) to this standard form provision are not appropriate or necessary.

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(Paras 16.2.27 – 16.2.31) This article appears on page 46 [Trees subject to Tree Preservation Orders (TPO)] of the N2T DCO. In this case, owing to the special importance of trees subject to TPOs, a definition of “near” is required for Art 51(2) to aid interpretation. Additional wording should be added to the effect that advance notice of proposed works must be given to the relevant planning authority and opportunity given for the relevant planning authority (within the timeframe for deemed consent allowed elsewhere in the Order) to impose reasonable conditions (i.e.as to method of pruning/appropriate timing of tree work) before such tree works are allowed to proceed. (Paras 16.2.32 – 16.2.33)	For the reasons more particularly set out on page E22 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] the proposed amendments (in relation to local authority notice and application of conditions or amendments to the term “near”) to this standard form provision are not appropriate or necessary.
This article [Article 56 – Safeguarding] appears on page 48 of the N2T DCO. This article places an obligation on BDC as relevant planning authority to consult the undertaker in relation to future proposed development within the Order land before granting any new consent. In addition, this obligation to consult must be registered as a local land charge. The term “business days” is used in the context of this Article but not elsewhere in the DCO. The Council recommends that all time limits throughout the DCO are expressed consistently in business days. (Paras 16.2.34 – 16.2.36)	As more particularly set out on page E22 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] this is consistent with made development consent orders but the Applicant will consider the point and respond substantively on appropriate relevant amendments (if any) at Deadline 3.
This article [Article 61 – Service of Notices] appears on page 50 of the N2T DCO. The Council requests that an agreed protocol between Council and undertaker is established from the outset in order to secure efficient and direct communication between parties. (Paras 16.2.37 – 16.2.38)	This article replicates the wording of article 45 of the National Grid (Hinkley Point C Connection Project) Order 2016 and article 57 of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024. The Applicant notes that the Council is not seeking to alter this standard form procedural wording but wishes to agree within its context how notices are to be given day to day. This is noted and would be a matter for discussion between the Applicant

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Schedule 1 is set out on pages 53 – 73 of the N2T DCO. There are 40 categories of work plans of which numbers 13-17, 31-32, 37 and 40 affect Braintree District. The description of 'authorised development' is widely drafted to include a whole range of associated development which affords (much) latitude to the undertaker. However, to introduce some control over associated but currently unspecified works, then the words "in the opinion of the relevant planning authority" should be added to the final paragraph of the definition of 'associated development' at page 73 before the words ...'give rise to materially new.... 'to bring the text in line with Schedule 3 paragraph 1(4) but also the suggested amendments to definition of "maintain" (Article 2). Without such clarification it is unclear who is to be the arbiter of whether such works give rise to such effects in case of dispute. In addition, a typo is noted in the preamble to Work 32 and this should be corrected (Substitute 'Braintree District' for 'Braintree Borough') The relevant planning authority should be notified as to which works have been carried out as Associated Development for these purposes for ease of monitoring. (Paras 16.2.39 – 16.2.43)	and the Council following the making of the Development Consent Order. For the reasons more particularly set out on page E22 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] these proposed amendments are not appropriate or necessary. The Applicant has corrected the typo in the draft Development Consent Order.
This provision [Paragraph 3(2), Schedule 3] requires a stages plan to be submitted prior to commencement. This provision is also found in the B2T DCO. However, there is no requirement (unlike in the Brechfa and Richborough DCO's) for the relevant planning authority to approve that staging plan prior to commencement of works. As such, the Council request that "for approval" is added at end of the text at Art 3(2).	For the reasons more particularly set out on page E23 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] the proposed amendments to this Requirement are not appropriate or necessary.

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In addition, the Council request prior notice is given to the relevant planning authority as to commencement of each stage as soon as practicable but in any event not later than 10 days before works commence in order to support good communication. (Paras 16.2.51 – 16.2.53)	
This provision [Paragraph 6, Schedule 3 – Design and Layout Plans] requires the authorised development to be carried out “in general accordance with” the levels shown on plans. The dDCO does not expressly provide for what “general accordance” means (aside from in reference to environmental effects). The ES generally assumes the pylons as in the midline of the Order Limits. If a pylon is closer to a receptor, but also higher, then there is likely to be a negative impact on said receptor (as being closer without change in height is likely to make it more dominant/overbearing etc). The dDCO appears to “disapply” any effect from lateral movement within the Order Limits. For consistency with other provisions and in the interests of sound planning principles, the wording “general accordance with” should be amended to “in substantial accordance with.” The planning authority should have a say in whether the changes give rise to any materially new or materially different environmental effects from those identified in the environmental statement. As such, the wording should be updated: The authorised development will not be in substantial accordance with the design and layout plans (elevations) to the extent that any departure from the design and layout plans (elevations) in the opinion of the Local Planning Authority gives rise to any materially new or materially different effects... (Paras 16.2.55 – 16.2.58)	For the reasons more particularly set out on page E23 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] the proposed amendments to this Requirement are not appropriate or necessary.
The hours of work sought are excessive and allow for no meaningful respite for local residents. The Council's suggested amendments to	For the reasons more particularly set out on page E23 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132]

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the working hours, and other provisions in this schedule, can be found in Section 14 of this LIR. In addition to this, the relevant Local Planning Authority should be notified of any working outside of core hours. The wording of the dDCO should be updated to reflect this requirement. (Paras 16.2.59 – 16.2.60)	the proposed amendments to this Requirement are not appropriate or necessary.
As per previous comments, for consistency and in the interests of sound planning principles, the wording “in general accordance with” should be amended to “in substantial accordance” with. (Para 16.2.63)	For the reasons more particularly set out on page E23 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] the proposed amendments to this Requirement are not appropriate or necessary.
The N2T DCO [Schedule 4 – Discharge of Requirements – Paragraph 1] as drafted only allows 28 days for a decision to be made on any submitted application for approval/consent/agreement pursuant to a Requirement. The explanatory memorandum explains that the 28-day period is appropriate for a project of this scale and size to ensure the timely delivery of the project. This is not acceptable to the Council. A 28-day period is insufficient to assess complex technical matters and cross-boundary issues. There are limited numbers of officers with detailed knowledge of the project, and the cumulative effect of staff leave would render this timeframe even less achievable. Furthermore, the risk of deemed consent after 28 days could result in Requirements being refused or approved without sufficient time to fully assess or resolve outstanding issues. It is noted that other projects provide longer periods for the discharge of Requirements. For example, the National Grid Hinkley Point C Connection Project Order 2016 allowed 8 weeks for major applications and 5 weeks for minor applications; the Brechfa Forest Wind Farm Connection Order 2016 (PINS reference EN020016) allowed 8 weeks; and the Bramford to Twinstead NSIP (PINS reference EN020002) allowed 35 days.	For the reasons more particularly set out on page E23 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] the proposed amendments to these provisions are not appropriate or necessary. The uses of “business days” rather than “calendar days” across the draft Development Consent Order is consistent with made development consent orders but the Applicant will consider that point and respond substantively on appropriate relevant amendments (if any) at Deadline 3.

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Based on direct experience with the Bramford to Twinstead NSIP, even a 35-day period is very challenging and has, on occasions, led to Requirements not being determined favourably due to time constraints. While extensions of time are often agreed through good working relationships, this could largely be avoided with a more reasonable statutory timeframe. The Council considers that 56 days (8 weeks) would be a reasonable period to facilitate the effective discharge of Requirements. The Council therefore requests that the time period for discharging Requirements is extended to 56 days, as opposed to the 28 days currently proposed. The Council also suggest considering the consistent use of business days rather than calendar days for calculating consent periods. (Paras 16.2.64 – 16.2.70)	
The Council considers [in relation to Schedule 4 – Discharge of Requirements – Paragraph 2 and 3] that a longer period is required (a minimum of 7 business days) to enable consultees to determine whether further information is required. Where the Council, as discharging authority, is required to consult third parties, an amendment should be made to require the undertaker to serve the relevant documentation on the relevant Requirement consultee at the same time as serving it on the Council as the discharging authority. This approach is adopted to some extent within the B2T DCO and enables more efficient use of time. (Para 16.2.72)	The Applicant set out on page E23 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] why it considers that the existing drafting provides appropriate flexibility in the context of the Project. However, the Applicant is committed to agreeing pragmatic ways of working with host authorities and will respond by Deadline 3 on whether amendments (if any) in respect of third party consultation pursuant to Requirements are appropriate.
Paragraph 3 - the fee at Schedule 4 Paragraph 3(1)(b) needs to be updated in line with latest planning fee guidance at the time the Order is confirmed. The regulations allow for a year on year increase in fees with the next increase anticipated in April 2026; given the proposed seven year implementation period and it is likely that the prescribed fee may increase significantly during this period. (Para 16.2.73)	The Applicant has updated the draft Development Consent Order to refer to the current application fee in national guidance.

Braintree District Council's Statement	Applicant's Response
The Council has significant concerns with the Draft Development Consent Order (DCO) as submitted for the Norwich to Tilbury project. While the Applicant provided the Council with an opportunity to comment on a pre-submission draft DCO, many substantive concerns raised jointly by the Council and Essex County Council have not been addressed in the submitted Order, nor has any explanation been provided where comments have been disregarded. This lack of engagement undermines confidence that the DCO, as drafted, provides an appropriate or proportionate framework for controlling the construction, operation, maintenance and decommissioning of the scheme. Drawing on direct experience of the Bramford to Twinstead DCO and other comparable National Grid projects, the Council considers that the N2T DCO departs from established and accepted precedents in a number of material respects. In particular, the DCO confers excessively wide powers on the undertaker, limits the ability of the relevant planning authorities to exercise effective oversight, and relies on imprecise or undefined terminology that introduces unnecessary uncertainty and risk. Key concerns include the overly expansive definition of pre-commencement operations, the absence or downgrading of critical control documents, and insufficient safeguards to ensure that future maintenance, associated development and deviations from approved plans do not give rise to materially new or different environmental effects. The proposed limits of deviation, especially in respect of vertical deviation, are not adequately justified and pose clear risks to landscape, heritage and residential amenity. The Council also objects to the lack of mandatory obligations requiring the Undertaker to complete, maintain, decommission or remove infrastructure where it becomes obsolete. The Council further considers that the proposed Requirements regime is inadequate. Several Requirements commonly found in comparable DCOs are missing entirely, and others provide	These paragraphs are a summary of the draft Development Consent Order-related matters above, which the Applicant has addressed in the relevant rows above.

Braintree District Council's Statement	Applicant's Response
insufficient time for proper consideration of complex technical submissions. The proposed 28-day discharge period is unreasonably short and risks deemed consent without proper scrutiny; a minimum 56-day period is sought to enable applications to be properly processed, alongside greater consistency in the use of business days when calculating relevant time limits. In addition, the Council seeks clearer approval roles for the relevant planning authority, improved notification provisions, and more robust consultation requirements, particularly where works take place outside the Order Limits or affect protected assets such as trees subject to Tree Preservation Orders. Overall, the Council does not consider that the DCO, as currently drafted, strikes an appropriate balance between flexibility for delivery and the need for proper environmental protection, transparency, and local authority control. The Council therefore requests that the Examining Authority give careful consideration to the amendments sought throughout this LIR and, where necessary, recommend further changes to ensure that the DCO is clear, enforceable, consistent with established precedent, and capable of being implemented without unacceptable impacts on the environment or local communities. (Paras 16.3. - 16.3.5)	
Overly wide definitions of pre-commencement operations, maintenance and associated development. Absence of key control documents and weaker Requirements than comparable National Grid DCOs. Insufficient approval, consultation and notification roles for the Local Planning Authority. Inadequate timescales for the discharge of Requirements, with an unacceptable risk of deemed consent. Lack of mandatory obligations for completion, maintenance, decommissioning and removal of obsolete infrastructure. (Paras 18.2.32 - 18.2.36)	These paragraphs are a summary of the draft Development Consent Order-related matters above, which the Applicant has addressed in the relevant rows above.

Brentwood Borough Council

Table 3.20 Brentwood Borough Council – Applicant’s Response to Local Authority comments on the draft DCO

Brentwood Borough Council’s Statement	Applicant’s Response
BBC acknowledges that the dDCO broadly follows the structure of previously approved DCO’s but considers that given the scale and complexity of this Project, it is essential that the Order reflects local requirements and does not simply replicate precedent where this would compromise effective implementation. BBC also notes several areas of the dDCO that require clarification and possibly amendment. (Para 9.1)	The Applicant has responded to the Council’s comment on page O6 of 8.4.1 Applicant’s Comments on Relevant Representations [REP1-132] and its position remains that, whilst it has necessarily adapted precedent drafting, the draft Development Consent Order is bespoke to this particular Project and its needs and circumstances.
First, the time frames set out in dDCO Schedule 4 Para 1 for discharging requirements must allow sufficient opportunity for the Council to undertake necessary checks, consult relevant stakeholders, and respond appropriately. BBC does not consider that the current dDCO 28-day period from first registration to decision is sufficient for this to be done. This time frame has been justified by NGET’s position that “shorter time limits are necessary and proportionate in light of the immediate and pressing national need which the Project is intended to address”. BBC does not accept this position for reasons set out in the Principle of Development and Alternatives section above, but wishes to put on record that NGET recognises that they are using shorter time limits that can only act to the detriment of the local authorities along the route. The Council’s concerns on this matter are further heightened by the use in the dDCO of deemed consent after 28 days and/or after approvals being ‘unreasonably withheld or delayed’, which may be for reasons beyond the Council’s controls and with outcomes to the ultimate detriment of its residents.	9.2-9.3 National Grid’s position is that a 28 day decision making timeframe is proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government’s Clean Power Target of 2030, is not unnecessarily delayed by means outside the control of the Applicant. Furthermore, Annex 2 of the National Energy System Operator’s (NESO) Clean Power 2030 Report published in November 2024 identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031. There is scope within paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) to extend the 28 day period for the discharge of Requirements by agreement in writing between the undertaker and the relevant authority. The 28 day period is considered to be appropriate and proportionate given the critical importance of the delivery of the Project to align with the government’s 2030 target.

Brentwood Borough Council's Statement	Applicant's Response
Similar to the above, Schedule 3 Para 3(1) requires that a written notice setting out the anticipated programme for the carrying out of pre-commencement operations must be given to the relevant planning authority no less than seven days prior to the date on which those pre-commencement operations are first carried out. Again, BBC considers that this time frame is too short for the requirements it places on the relevant local authorities and believes that further consideration should therefore be given to how the processes and timescales are set out in this and various parts of the dDCO, and their effect on the ability to fully consider and discharge requirements. Secondly, in relation to dDCO Part 3, Part 6 Section 49, as well as Schedule 2 Part 1, Schedule 2 Part 6, Schedules 5-9 and Schedule 13, ECC has raised detailed concerns regarding protective provisions in its capacity as highway authority for the borough, and BBC supports this need for robust measures to ensure the integrity of the local highway network, particularly in the context of the cumulative impacts as set out in the relevant section above. (Para 9.2-9.6)	9.4 As noted above, there is scope to extend the 28 day period for deemed discharges by agreement in writing between the undertaker and the relevant authority, which is intended to alleviate concerns regarding matters outside of the control of the relevant authority. The Applicant is unclear how approvals being withheld or delayed 'unreasonably' can be outside of the Council's control. 9.5 The wording proposed in paragraph 3(1) of Schedule 3 to the draft Development Consent Order has precedent in recently made development consent orders including the National Grid (Bramford to Twinstead Reinforcement) Order 2024. Conversely, the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 does not include any requirement to give notice before pre-commencement operations are first carried out. Given this is just a notification procedure, the pre-commencement operations must be carried out in accordance with the relevant outline management plans, and there are no obligations placed on the relevant authorities, the Applicant is unclear why a longer notice period would be necessary. 9.6 The Applicant has provided a response to the comments raised in its comments on Essex County Council's Local Impact Report and its responses to relevant representations.
BBC also maintains its position that further clarity is needed on the scope of authorised development and the limits of deviation, so that the consent granted accurately reflects the development examined.	The Applicant has responded to the Council's comment on page O6 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] and considers the scope of the authorised development and limits of deviation to be sufficiently clear.
Lastly, similar to that adopted for the Lower Thames Crossing, BBC also strongly encourages the inclusion of a Register of Requirements within the DCO for the purposes of transparency and accountability and to ensure ongoing fairness and clarity throughout the Project's delivery.	For the reasons more particularly set out on page O7 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] the Applicant does not consider a Register of Requirements to be necessary in the circumstances of this Project.

Chelmsford City Council

Table 3.21 Chelmsford City Council – Applicant’s Response to Local Authority comments on the draft DCO

Chelmsford City Council’s Statement	Applicant’s Response
Applicants are encouraged to engage in discussions on draft documents ahead of submission, to resolve matters where possible. CCC recognises in line with Nationally Significant Infrastructure Projects: Advice for Local Authorities as published by Planning Inspectorate on 8 August 2024, (updated 16 December 2024), there is a responsibility on the local authority to “Consider the Applicant’s draft Development Consent Order (DCO), including requirements”. Despite repeated attempts to engage with NGET regarding the content and form of the draft DCO, regrettably the details of the draft Development Consent Order were not shared with CCC in advance of the submission. NGET offered CCC an opportunity to review some elements of the draft DCO ahead of submission, albeit noting that there were some omissions). CCC, working with Essex County Council (ECC), provided comments to the Applicant detailing a number of concerns. However, no feedback was offered by the Applicant on the comments provided. It appears from the Development Consent Order as submitted (APP-056) that many of the comments provided have not been taken into account, and no explanation has been offered. While CCC will continue to engage with the Applicant regarding the dDCO, there continue to be a number of issues which require resolution before any order can be made. (Paras 10.1-10.4)	The Applicant has responded to the Council’s comment on page H37 of 8.4.1 Applicant’s Comments on Relevant Representations [REP1-132].
Article 2 “Control Documents” The N2T DCO includes an “outline code of construction practice” but does not include a Construction Environmental Management Plan, Materials and Waste Management Plan. Clarity is required as to which	As noted on page E21 of 8.4.1 Applicant’s Comments on Relevant Representations [REP1-132], 7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [APP-302] and 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306] are

Chelmsford City Council's Statement	Applicant's Response
documents will cover the scope of these matters, given their importance in managing the delivery phase of the scheme. (Para 10.5)	provided as appendices of 7.2 Outline Code of Construction Practice [Revision B]. The Outline Code of Construction Practice includes all information that would typically be found within a Construction Environmental Management Plan (CEMP), therefore a separate CEMP would not be required. These documents are controlled by Requirement 4 in Schedule 3 to the 3.1 Draft Development Consent Order [APP-056].
Article 5 – Limits of Deviation The Limits of Deviation (LoD) are set out on page 10 of the N2T DCO. These allow for longitudinal and lateral deviation (unrestricted) within the Order Limits, as well as vertical deviation. The N2T DCO proposes a vertical deviation of 6m. The explanatory memorandum sets out why flexibility across the scheme in its entirety is necessary to avoid the risk of the scheme becoming incapable of implementation due to unforeseen ground conditions or engineering considerations. This is accepted in principle by the CCC. Yet the LoD have potentially significant implications for landscape and visual impacts, heritage impacts and noise, as discussed in the relevant chapters of this LIR. CCC consider that a virtual deviation of 6m is too high and unjustified. This should be amended to a maximum of 4m high, to minimise environmental impacts. In Great Waltham and Little Waltham, the Limits of Deviation make provision to increase the height of the lower height pylons TB140 – TB142 to full height pylons. The requirement, as currently worded, enables alteration to the height of these pylons, but is silent on the horizontal limits of deviation which are referred to in the works plans. Should this change be implemented, and full height pylons installed post consent, the requirement as it stands makes no reference to publicise the alteration and inform the Local Planning Authority and the host communities of the change.	As noted on page E21 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132], six metres is the same upward deviation as was allowed for in The National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024, and is intended to provide a necessary but proportionate degree of flexibility in the construction of the authorised development and to reduce risk. It allows the addition of two standard pylon sections, each measuring three metres in height. The limits of deviation have been assessed in the Environmental Statement submitted with the application for development consent [APP-123 to APP-298] and no re-assessment is required. The Applicant has responded to the Council's comments on the limits of deviation in the Walthams (see pages H38 to H39 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132]).

Chelmsford City Council's Statement	Applicant's Response
An additional requirement or appropriate mechanism should be provided to enable consultation and notification of any alteration to the height and location of the lower height pylons. The Limits of Deviation enable the movement of pylons along the Overhead Line without consultation. This is unacceptable as the movement could lead to increased and unacceptable harm. Affected receptors should be reassessed for any movement along the Overhead Line to ensure that they do not lead to harm. (Para 10.6-10.9)	
Article 51 – Trees subject to Tree Preservation Orders (TPO) Due to the special importance of trees subject to TPO's, a definition of "near" is required for the avoidance of doubt. Additional wording should be added to the effect that advance notice of proposed works must be given to the Local Planning Authority and opportunity given for the planning authority to impose reasonable conditions (i.e.as to method of pruning/appropriate timing of tree work). (Para 10.10)	As noted on page E22 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132], Article 51 (Trees subject to Tree Preservation Orders) within 3.1 Draft Development Consent Order [APP-056], together with 2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055], set out controls on the Applicant's powers to fell and lop trees protected by TPOs, both within and outside the Order Limits. These controls are consistent with controls used in several precedent DCOs, including The National Grid (Bramford to Twinstead Reinforcement) Order 2024 and The National Grid (Yorkshire Green Enablement Project) Development Consent Order 2024. The use of 'near' is to mirror the wording used in Article 50 (Felling and lopping of trees, etc). A definition of near is not necessary because for the power to be exercised lawfully, the Applicant must consider it necessary to prevent an obstruction or interference with the construction, maintenance or operation of the authorised development and any associated apparatus, or from constituting a danger to persons construction, maintaining, or operating the authorised development. Additionally, Article 51(3) of 3.1 Draft Development Consent Order [APP-056] places a statutory duty on the Applicant not to cause any unnecessary damage to any tree when exercising its powers under this article, a breach of which would be an offence.

Chelmsford City Council's Statement	Applicant's Response
	The Applicant does not propose to include provision for advance notice and consent due to the existence of controls within 3.1 Draft Development Consent Order [APP-056] and to ensure that the delivery of the Project, which is of critical importance to the UK government's Clean Power Target of 2030, is not unnecessarily delayed by matters outside the control of the Applicant.
Schedule 3 (Requirements) Archaeology Archaeological mitigation measures are secured through proposed requirement 5 in the Draft DCO. Should the Project be granted based on the current levels of evaluation, any requirement should explicitly allow for a separate evaluation stage of archaeological work, before securing a detailed investigation stage as mitigation. The Requirement wording for Archaeology (Requirement 5) (APP-056) does not currently take into account the post-consent programme of archaeological trenching required, or secure timescales for delivery of the Post-Excavation Assessments. It is suggested that article 5(4) is replaced with the wording below and an additional point, 5(5), is included. This will give clarity for sign-off (our proposed condition 5(4)) and also provide reassurance of a robust mechanism for securing both the field and post-excavation works "5 (4) Intrusive site preparation works must not take place until an archaeological or geoarchaeological written scheme(s) of investigation in accordance with the outline written scheme(s) of investigation as appropriate has been submitted to and approved by the discharging authority in consultation with Historic England. The archaeological or geoarchaeological written scheme(s) of investigation required under this sub-paragraph must be implemented as approved. 5 (5) Unless otherwise agreed with the local planning authority. a. No later than one year following the completion of the fieldwork specified in each site-specific written scheme of investigation, a site-specific post excavation assessment (PXA) for that site must	As noted on page H21-H22 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132], Requirement 5 within 3.1 Draft Development Consent Order [APP-056] already includes provision for evaluation. The post-consent process and techniques in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] includes evaluation and this document is secured through Requirement 5. The Applicant has addressed the proposed Requirement wording earlier in this section (Development Consent Order, Requirements and Management Plans) of this document.

Chelmsford City Council's Statement	Applicant's Response
be completed in accordance with the Written Scheme of Investigation and submitted to the local planning authority for approval. b. No later than one year following the approval of the final site-specific post excavation assessment, an archaeological updated Project design for all applicable sites, must be submitted to the local planning authority for approval. The archaeological updated Project design must be produced in general accordance with the detailed Written Scheme of Investigation for each stage, include details of the scope of post-excavation analysis and publication and have regard to the site-specific research agendas set out in the site-specific written schemes of investigation. c. Post-excavation analysis and publication must be carried out in accordance with the approved archaeological updated Project design and provision made for the full archive to be submitted to the appropriate museum.	
(Para 10.14-10.15) Schedule 4 – Discharge of Requirements – Paragraph 2 & 3 CCC considers that a longer period is required (a minimum of 15 business days) to enable consultees to determine whether further information is required in common with Longfield Solar Farm DCO. Where the Council, as discharging authority, is required to consult third parties, an amendment should be made to require the Applicant to serve the relevant documentation on the relevant Requirement consultee at the same time as serving it on the Council. This approach is adopted to some extent within the Longfield Solar Farm DCO and enables more efficient use of time.	As the Applicant noted in 8.4.1 Applicant's Comments on Relevant Representations [REP1-132], given the Project's status as a project of critical national importance, the Applicant considers five days for the relevant discharging authority to request additional information to be proportionate and appropriate. It aligns with the timeframe in the draft National Grid (Sea Link) Order. Paragraph 2(4) of Schedule 4 to 3.1 Draft Development Consent Order [APP-056] allows the relevant authority to seek the Applicant's consent to request further information after the five-day period if necessary.

Chelmsford City Council's Statement	Applicant's Response
Paragraph 3 - the fee needs to be updated in line with latest planning fee guidance. (Para 10.28-10.30)	Likewise, Paragraph 1(1)(c) of Schedule 4 to the draft DCO allows the relevant authority to agree in writing a longer decision period with the Applicant. The Applicant considers that the existing drafting provides appropriate flexibility, but has been, and continues to be, committed to collaborative working with the relevant authorities and will continue to engage on these matters throughout Examination and post consent should development consent be granted. The Applicant has updated the fee in paragraph 3 of Schedule 4 to 3.1 Draft Development Consent Order [Revision B] to reflect the current guidance.

Colchester City Council

Table 3.22 Colchester City Council – Applicant's Response to Local Authority comments on the draft DCO

Colchester City Council's Statement	Applicant's Response
CCC are collaborating with Essex County Council on legal matters and would like to echo the comments from ECC's legal team with regards to the wording of the DCO. This is set out in ECC's LIR but replicated in full below for completeness [...].	We note the Council is aligned with the representations made on the draft Development Consent Order in Essex County Council's Local Impact Report. The Applicant has responded to Essex County Council's Local Impact Report and does not repeat its responses on draft Development Consent Order matters here.

Essex County Council

Table 3.23 Essex County Council – Applicant’s Response to Local Authority comments on the draft DCO

Essex County Council’s Statement	Applicant’s Response
ECC have confirmed their desire to enter into a Framework Highways Agreement or similar side agreement with the Applicant both verbally and in writing when responding to informal comments on the Protected Provisions. ECC have not received any confirmation from the Applicant and so have included this point in the Local Impact Report. ECC would welcome further engagement on this point to provide a level of surety for ECC ahead of the close of the examination. This is of importance as ECC are not satisfied with the level of detail included in the Protected Provisions. As the LHA, ECC would expect (and indeed the public and County Council members would expect) a level of oversight and management of the local highway network. ECC believe the Framework Highways Agreement has worked well on Bramford to Twinstead, providing sufficient oversight, and collaboration between the local highway authority and the developer. From experience at the implementation stage, contractors welcome the ‘business as usual’ approach which is our standard practice rather than bespoke arrangements that neither the LHA or the contractor are familiar with.	The Applicant shared draft protective provisions with the highways authorities in July 2025 and sought comments on this draft. This version of the Protective Provisions was then included in the draft Development Consent Order at submission, pending negotiation with the highways authorities. The Applicant has received some initial comments from Essex County Council and it is noted from correspondence with Norfolk County Council that the local highways authorities are jointly appointing legal advisors to advise in relation to the Protective Provisions (or a joint highways framework Agreement). Confirmation of the legal advisors acting is awaited. It is the Applicant’s understanding that the highways authorities are seeking a joint highways framework agreement in lieu of protective provisions, which the Applicant will seek to negotiate with the relevant authorities, provided it can be concluded before the end of the Examination. A draft of this agreement was shared on the week commencing 23 February 2026 (along with updated Protective Provisions to reflect Essex County Council’s comments) to all the highways authorities and we await comments.
Part 1 Preliminary Article 2 – Interpretation For consistency within the DCO, there are a number of definitions and drafting points to be addressed (such as the use of ‘business day,’ ‘working day’ and ‘day’ interchangeably; and ‘discharging authority’ and ‘relevant authority’). ECC proposes that all periods of seven days or less be specified to be business days.	As noted in the Applicant’s Comments on Relevant Representations, the use of days rather than business days in a small number of places in 3.1 Draft Development Consent Order [APP-056] is consistent with precedent DCOs, including The National Grid (Bramford to Twinstead Reinforcement) Order 2024 and The National Grid (Yorkshire Green Enablement Project) Development Consent Order 2024. The Applicant will consider whether ECC’s proposal that periods of seven days or less be specified to be business days can be

Essex County Council's Statement	Applicant's Response
The Permit Scheme and Traffic Regulation Order ("TRO") definitions need to be aligned with each other in terms of timescales and process. For clarity, the Permit Scheme includes the temporary TRO process within it. It is further queried whether the Environmental Permitting (England and Wales) Regulations 2016 and the Energy Act 2004 should also be mentioned in this section. They are relevant to the dDCO "Pre-commencement operations". There are concerns with the definition of pre-commencement operations in respect of works 'excluded from the commencement of development' and associated with the establishment of construction compounds. These operations are extensive and include temporary laydown areas and compounds and the creation of bell mouths all of which could necessitate the potential removal of trees and hedgerows in advance of any Requirement for a Vegetation Retention and Removal Plan being discharged. This is also of specific concern in respect of historic buildings where it is noted that specified pre-commencement operations could proceed without triggering necessary mitigation likely to be set out in the Requirements. While the submitted ES assumes that the excluded works and operations would be unlikely to have any significant environmental effects, ECC is of the opinion the effects of some of these works could have major impacts locally that need mitigating, or which could cumulatively give rise to significant effects needing mitigation. As a result, these works have the potential to be so significant as to give rise to materially new/different environmental effects which ought properly to be subject to further checks before being allowed to proceed. In light of this, ideally many operations (such as the establishment of construction compounds), should be excluded from the definition of precommencement operations. If this is not acceptable, a compromise could be the addition of a tailpiece:	included in the updated draft Development Consent Order at Deadline 3. The Applicant notes the Authority's comments on the consistency of terminology in the 3.1 Draft Development Consent Order [APP-056] and will review and consider these points in the next revision of the 3.1 Draft Development Consent Order [APP-056]. The Environmental Permitting (England and Wales) Regulations 2016 is already included in Article 2 (Interpretation) as "the 2016 Regulations". The Energy Act 2004 is not referred to in the draft Development Consent Order and therefore does not need to be included in this article.

Essex County Council's Statement	Applicant's Response
'those operations which the relevant planning authority considers give rise to a materially new or different environmental effect beyond that considered in the Environmental Statement as notified to the Undertaker by the relevant planning authority' Pre-commencement surveys of listed buildings should be included in the list of pre commencement operations, as they have the potential to be impacted by vibration once the development commences.	
"Maintain" The definition of "maintain" includes a wide range of specified operations in relation to the authorised development, providing that as long as such works do not give rise to any materially new or materially different environmental effects to those identified in the Environmental Statement, these specified operations can take place without further consent. To provide clarity and avoid any dispute, the DCO should incorporate a mechanism for assessing and determining whether such maintenance works give rise to materially new/different environmental effects. As a result, the definition of 'maintain' be amended to include "provided such works do not in the opinion of the local planning authority give rise to any materially new or materially different environmental effects to those identified in the Environmental Statement, and any derivative of "maintain" must be construed accordingly."	As noted on page E21 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132], in the context of maintenance, the Applicant would determine whether the proposed maintenance works would give rise to any materially new or materially different environmental effects. This is consistent with the Applicant's statutory duty to maintain a safe and efficient transmission network.
Omission of outline management plans The dDCO omits reference to outline management plans which were included in the B2T DCO, namely: an Outline Construction Environmental Management Plan. It also omits reference to an outline Noise and Vibration Management Plan (APP-306), and an outline Dust Management Plan (APP-304), both of which are envisaged in the Applicant's Environmental Statement (as appendices to the Code of Construction Practice, but	As noted on page E21 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132], 7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [APP-302] and 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306] are provided as appendices of 7.2 Outline Code of Construction Practice [Revision B]. The Outline Code of Construction Practice includes all information that would typically be found within a

Essex County Council's Statement	Applicant's Response
worthy of separate definition in ECC's view, as these are seen as being absolutely necessary to protect enjoyed residential amenity). The need for these plans is addressed further in the section concerning the Requirements. Any other outline management plans should also be defined in Article 2.	Construction Environmental Management Plan (CEMP), therefore a separate CEMP would not be required. These documents are controlled by Requirement 4 in Schedule 3 to the 3.1 Draft Development Consent Order [APP-056]. The term "Noise and Vibration Management Plan" is not used in the draft Development Consent Order, which is why it does not have a separate definition, however, the outline management plan is, as the Council has recognised, an appendix to the Code of Construction Practice and hence is controlled by Requirement 4 of Schedule 3 to the draft Development Consent Order. As per the Noise and Vibration Management Plan, without express use of the named management plans, there is no purpose in providing definitions.
"Provisional Advance Authorisation" A definition of "provisional advance authorisation" (as per Reg 2 Traffic Management Permit Scheme Regs 2007) should be included in the dDCO to ensure consistency with other DCO, including the Bramford to Twinsted project.	This term is already defined in Article 2 (Interpretation) of the draft Development Consent Order in the same way as it is defined in the National Grid (Bramford to Twinstead Reinforcement) Order 2024.
Part 2 Principal Powers Article 3. Development consent etc. granted by the Order While Article 3(1) confirms that, subject to the provisions of the Order (including the Requirements) National Grid is granted development consent, the extent of the consented development should be clarified by the addition of "to be carried out within the Order limits" (as defined in the dDCO). This is so that the scope and limits of the development consent are clearly set out and reflect the development subject to the examination. Article 3(6) provides for the authorised development to include and permit the alteration, removal, clearance, refurbishment, reconstruction, decommissioning and demolition of any other building or other structure within the Order limits, to the extent that they relate	In relation to the comment on Article 3(1), please refer to page O6 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132]. The Applicant notes the Council's point on article 3(6) and will review and consider whether this can be included in a revised draft Development Consent Order to be submitted at Deadline 3.

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to, are required by or are incidental to the carrying out of the authorised development. As this is not limited to the authorised development described in Schedule 1 (and “authorised development” is defined more broadly than that in Article 2), the dDCO should incorporate a mechanism for assessing and addressing any materially new or different environmental effects which have not previously been assessed in the Environmental Statement arising from the development authorised in Article 3(6).	
Article 4 4. Maintenance of authorised development As raised within Part 1 Preliminary, Article 2 – Interpretation, the scope of works permitted to maintain the authorised development is broad. The dDCO should incorporate a mechanism for assessing and addressing any materially new or different environmental effects which have not previously been assessed in the Environmental Statement arising from such works. In addition, under this Article, there should be an ‘in principle’ obligation on the Undertaker to decommission (part of) the authorised works as and when they become obsolete due to improvements in technology or otherwise.	As noted on page E21 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132], in the context of maintenance, the Applicant would determine whether the proposed maintenance works would give rise to any materially new or materially different environmental effects. This is consistent with the Applicant's statutory duty to maintain a safe and efficient transmission network. This is not necessary. As a transmission licence holder, the Applicant has statutory duties to maintain its apparatus in order to ensure a safe, effective and efficient electricity transmission system.
Article 5. Limits of Deviation (LoD). ECC considers that the LoD potentially have significant implications for how the development is experienced and in terms of its relationship to a variety of receptors. Firstly, at Article 5(1)(a) the term ‘lines or situations’ should be defined and added to list of definitions as the language lacks the clarity required given the importance and potential significance of this element of the DCO. The Limits of Deviation (LoD) allow for longitudinal and lateral deviation within the limits shown on the Work Plans, as well as vertical deviation.	The term ‘lines and situations’ is a commonly used and understood term in development consent orders, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024. The Applicant does not consider that this term needs to be defined. The Applicant has addressed the Council's concerns on limits of deviation relating to sensitive receptors in the Historic Environment section in Chapter 4 of this document and so we do not repeat that here. The Applicant has provided its justification for a six metre upwards limit of deviation earlier in this document and does not repeat it here. In respect of the downwards limits of deviation, the Applicant considers there to be sufficient controls included in the outline

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ECC notes that Article 5(1)(b)(i) would permit a vertical limit of deviation of 6 metres for the majority of the pylons. The Explanatory Memorandum (APP-057) explains that the rationale for the 6m limit is intended to provide a necessary but proportionate degree of flexibility. While noted, ECC is of the opinion this is a considerable extent of deviation, which as proposed, is not suitable for particularly sensitive areas such as nearby residential properties, in or nearby protected landscapes and nearby Grade 1 listed buildings, where the potential impact would potentially be greater than in other areas. The limits of deviation are of particular potential concern with regards to the following designated heritage assets which are in closest proximity to the Order Limits and where a Mid-level of Less than Substantial Harm (LTSH) to their significance has been identified by the Applicant at the Operation and Maintenance phase of the project. [...] These properties are provided as examples and are not intended to be an exhaustive list of all assets where there are potential concerns with regards to the limits of deviation. There is the potential for designated heritage assets that have been assessed as having a Low level of LTSH to their significance during the operational phase to instead experience a Mid-level of LTSH due to pylons, overhead lines and other permanent above ground structures being in closer proximity than the existing plans, due to the proposed lateral and longitudinal limits of deviation. It is therefore proposed that the limit vertical deviation should be no more than 4 metres, (as per Bramford to Twinstead DCO, which is a more local, and thus more relevant development than the Yorkshire Green Energy Project, to which the Applicant refers in the Explanatory Memorandum). Anything beyond this 4 meters should require prior approval from the relevant planning authority. At Article 5 (1)(d)(ii), the draft Order would also allow underground cables to be moved downwards to such extent as the undertaker	management plans. The proposed drafting mirrors the drafting contained in Article 5 of the National Grid (Bramford to Twinstead Reinforcement) Order 2024.

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considers necessary or convenient. While this may be acceptable in certain locations, other locations may be more sensitive due to ground conditions, water tables, archaeology or the cumulative effects of other structures being constructed. In certain defined locations (which should be discussed and agreed with the district authorities) therefore; the limit of deviation downwards should be restricted unless otherwise agreed by the local planning authority. This concern also extends to downward deviation permitted under Article 5 (3)(b). The proposed level of deviation within Article 5(3)(a) allows permanent above ground structures, erections and apparatus forming part of the authorised development, including substations, converter stations and cable sealing end compounds to be located anywhere within the parameters shown by the pink dashed lines on the Works Plans. They may also be up to 10% above the maximum height shown on the table of parameters forming part of the Works Plans. This is not appropriate in designated sensitive areas, where this provision needs to be reduced. These sensitive areas must be discussed and agreed between the Applicant and all relevant authorities. In this regard, it is suggested for those designated locations, a lower level of deviation is agreed or a process of prior approval with the relevant local planning authority is introduced. In addition, it is assumed that the level of deviation proposed is consistent with the principles of the Rochdale Envelope which involves defining a set of parameters (e.g., maximum building height, footprint, etc.) within which a development can vary. In any event, confirmation is requested that the impacts and worst-case scenarios arising from the limits of deviation are fully assessed in the Environment Statement.	
Part 3 Streets Article 11. Street Works Article 11(3) would enable envisaged works in the highway to proceed without express consent from the Street Authority if a decision is not	The Applicant has responded to the Council's comments on the 28-day decision period earlier in this document and within 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] and does not repeat its justification here.

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provided within 28 days. ECC agrees with the approach, but not with the timescale. The Bramford to Twinstead DCO included a timescale of 35 days which ECC requests for the Norwich to Tilbury DCO. Providing a longer timescale allows the authority to have sufficient time for necessary internal procedures to consider an application and has been achievable when working on Bramford to Twinstead. It also avoids the need to request repeated extensions of time which ECC has had to seek in respect of Longfield Solar Farm. Even with the longer time period in the Bramford to Twinstead DCO, extensions of time have been needed. Further clarity is required on the process for works to take place outside the Order limits as referenced in Article 11 (2). ECC's concern is that the assessment of the works is based on the Order limits and anything beyond that will not have been reviewed as part of the DCO process.	In developing the Order limits and drafting this provision and its associated Schedule 5, the Applicant has sought to identify all streets within which works would be necessary and has included those within the Order limits. However, to accommodate the situation where other works potentially outwith the Order limits are required, the Article as drafted allows for this. Where that scenario occurs, the Applicant's expectation is that planning permission (and indeed any further ancillary consents) will be required where works to be undertaken within any part of the highway outside of the Order limits comprise development within the meaning of Section 55 of the Town and Country Planning Act 1990. However, it would not be appropriate for the draft Development Consent Order to attempt to address all such eventualities (especially those which are already controlled as a matter of general planning law) and, particularly, to prescribe steps to be taken in respect of operations outside of the Order limits.
Article 12. Application of Permit Schemes ECC operates an established Permit Scheme which applies to all adopted streets. It applies to all works promoters, including the Highway Authority (ECC's own works). It involves the promoter applying for a permit to occupy the highway within a specified timescale for different levels of activity. Activities that require a Temporary Traffic Regulation Order ("TTRO") are defined as "Major Activities". The Permit Scheme requires submission of a Provisional Advance Authorisation (PAA) at least three months in advance of a proposed activity, and a permit ten working days before the activity is due to start. As currently drafted, the DCO references the Permit Scheme and in doing so accepts the timescales associated with it. However, the TTRO (at Article 16(8)) does not give the standard timescales expected for Permit Schemes. ECC are not able to agree to shorter timescales as the Authority deals with many requests from promoters	The Applicant acknowledges ECC's position regarding the timings of applications for TTROs, however: (a) notwithstanding applications from other developers, it remains unclear why a consent to use a temporarily closed street or public right of way as a temporary working site would require longer than 28 days' consideration by the Council; and (b) the 28-day timing referred to in connection with paragraph (5)(b) relates only to TTROs that are not already envisaged as being required in Schedule 8 of the draft DCO and so the Applicant does not anticipate there being a large volume of such applications. The Applicant does not consider it necessary to adjust the timescales in the draft Development Consent Order.

Essex County Council's Statement	Applicant's Response
and the standard timescales given allow sufficient time to deal with the full workload involved. As already shown through the cumulative impact section there is expected to be an overlap of works in Essex of other NSIPs, Garden Communities and Strategic Sites. These works are aside from the many other smaller scale developments and utility works which will all require Permit Scheme applications. Following ECC's established standard processes rather than trying to set up new processes with tighter deadlines will provide a more streamlined approach and collaborative working. It is therefore requested that the timescales for the TTROs are altered to reflect ECC's standard timescales for the Permit Scheme and that the wording reflects that the Temporary Traffic Regulation Order is part of the Permit Scheme.	
Article 16 Temporary closure of streets and public rights of way ECC do not accept the 28-day timescale as noted at Article 16(8) in relation to a street authority failing to respond to an application for consent. This is on the basis that a Temporary Traffic Regulation Order for temporary closure of streets would be required and as already highlighted above (under Article 12) is intrinsic within the Permit Scheme which takes 3 months to process. The Temporary Traffic Regulation Order for public rights of way would also require up to 3 months to process. It has to be acknowledged that any closure of access will be difficult for residents – especially where the access is being used for a site compound which could be situated somewhere else/ or where it is for a vague/open-ended period. It is therefore requested that the length of time for a temporary closure is specified in the dDCO. With reference to Art 16 (6), there have been discussions through the PRoW Management Plan around providing 4m wide routes for bridleways which may be a betterment to existing in some cases - however, this is because the horses need space to turn due to spooking associated with the construction works. In effect this is	The Applicant has already provided its justification for requiring a 28-day deemed approval period in various responses in 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] and so it does not repeat that here, however, the Applicant would reiterate its points above that: (a) notwithstanding applications from other developers, it remains unclear why a consent to use a temporarily closed street or public right of way as a temporary working site would require longer than 28 days' consideration by the Council; and (b) the 28 day timing referred to in connection with paragraph (5)(b) relates only to TTROs that are not already envisaged as being required in Schedule 8 of the draft DCO and so the Applicant does not anticipate there being a large volume of such applications. The Applicant does not consider it necessary to adjust the timescales in the draft Development Consent Order. The Applicant acknowledges that closures to streets and public rights of way can be disruptive to regular users. However, ECC will appreciate that given the different reasons for such closures, it is not practical or helpful to specify the length of time for a temporary

Essex County Council's Statement	Applicant's Response
mitigation. This clause is potentially at odds with this 4m requirement and as such should be reworded	closure. Some temporary closures will be very short, whilst others may need to be slightly longer. 7.3 Outline Construction Traffic Management Plan [APP-309], which is controlled by Requirement 4 of the Schedule 3 to the draft Development Consent Order, sets out further details on these temporary closures. The wording of Article 16(6) does not prevent the Applicant from providing alternative routes to a higher standard where it is reasonable and appropriate to do so, but simply does not require all alternative routes to be of a higher standard. Article 16(6) is a provision that will apply generally, and which accounts for there being some exceptions, such as in the example provided by ECC.
Article 18 Construction alteration and maintenance of streets and other structures The wording of Article 18 does not set out how infrastructure will be maintained by the Applicant where the authority does not wish to adopt it. This will occur in particular with the proposed footway/cycleway provision on Bentley Road which is to remain temporarily in place until the works have been completed, because the infrastructure is only needed whilst the works are taking place due to the high level of HGV activity and the impact on cyclists. ECC require the infrastructure to be maintained by the Applicant until such time as it is removed and the land returned to its previous state so wording in the dDCO should be made clear. The completion of works and maintenance timescale is more complex due to the need for multiple DCOs to use the proposed infrastructure. Further clarity is required on how these matters will be managed, and evidence in the form of a collaboration agreement between the various DCOs benefiting from the proposed mitigation. The infrastructure should be maintained at the same excellent standard as required by the LHA and with continuity between each DCO. The above should be included in the DCO to ensure that the mitigation	Article 18(1) and (2) each include an “unless otherwise agreed with the street authority” caveat to the maintenance provision for streets constructed, altered or diverted under this Order. Furthermore, where the Applicant uses land temporarily (including the construction of temporary accesses) it is required by Article 27 (Temporary use of land by National Grid) to reinstate the land to the reasonable satisfaction of the owners of the land. The Applicant does not consider it appropriate to have a commitment in its draft Development Consent Order that binds the Project with Five Estuaries, North Falls and Tarchon Interconnector on construction timetables, maintenance and mitigation strategies. These are separate schemes at different stages. However, the Applicant has committed to joining and engaging in the Developer’s Forum proposed by Essex County Council to help facilitate coordination. The 7.3 Outline Construction Traffic Management Plan [APP-309] further notes that the Main Works Contractor will liaise with the relevant highways authorities, National Highways and other major infrastructure developers to ensure a coordinated approach to construction traffic management.

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measures proposed will remain in good order for the duration of their availability to the public.	
Part 4 Supplemental Powers Article 20 Discharge of water 5.5.1 The timings set out within Article 20(9) must be increased to 42 days to give sufficient time for the Lead Local Flood Authority to consider any application for consent under this part of the DCO without having to arrange for an extension to the decision making period. This request reflects the available internal resourcing and the increase in time would also bring the DCO in line with other DCOs, such as Bramford to Twinstead.	The Applicant has previously responded on its justification for the 28 day deemed consent period. The Applicant notes that 42 days is longer than the period in the National Grid (Bramford to Twinstead Reinforcement) Order 2024. The 28 day period proposed by the Applicant is consistent with the timings in the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 and the A122 (Lower Thames Crossing) Development Consent Order 2025. The Applicant does not propose any amendments to this article.
5.6 Part 6 Miscellaneous and General Article 48 Defence to proceedings in respect of statutory nuisance (s82 EPA 1990) 5.6.1 Given the extent of this article, ECC suggests that a Noise and Vibration Management Plan should be prepared, as envisaged in the Applicant's Environmental Statement (APP-306).	An Outline Noise and Vibration Management Plan is provided at 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]. This outline management plan will be progressed as all other outline management plans will be and will be controlled by Requirement 4 of Schedule 3 to the draft Development Consent Order.
Article 49 – Traffic Regulation 5.6.2 ECC require the timescales at 49(10) for dealing with the permanent TROs to be 12 weeks to align with the Temporary Traffic Regulation Order process. This is to take account of resource and the cumulative impacts that are discussed at length in this LIR. 5.6.3 At Article 49(10) there is reference to consent having been deemed to be granted after 28 days. This is considered too short given the available resources and the requirement to consult with external consultees including the Police. It is requested this period be extended to 42 days.	Given the scale of the Project, the programme pressures and constraint costs that become payable for each day that the Project's energisation is delayed (all of which are explained in more detail elsewhere in this response), the Applicant cannot accept a 12 week period in Article 49 (traffic regulation).

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Article 50 – Felling or Lopping 5.6.4 ECC recognised that this Article allows for wide powers to do the tree work which the undertaker reasonably believes to be necessary and this consequently gives the Applicant powers to lop prune, cut, trim, coppice, pollard, reduce in height or width any tree shrub, shrubbery, hedgerow or important hedge under or within the overhanging or near part of the authorised development if it reasonably believes it necessary to do so to prevent obstruction/interference with construction, operation or maintenance of authorised development or any apparatus or from constituting a danger to persons constructing maintaining or operating the authorised development. 5.6.5 While a caveat about not causing unnecessary damage to trees / vegetation is included as is the requirement for consent where works involving trees / vegetation overhanging the highway, ECC maintains a concern that the use of the term 'near' is too ambiguous. This will lead to uncertainty and the potential for more works to be undertaken than absolutely necessary. As such, ECC consider that 'near' should either be removed, or defined as a specific value e.g. 2m, with works only occurring with some prior notice to the relevant LPA. 5.6.6 An open-ended option for vegetation to be removed without the impact of this being appraised is not supported as the impacts on protected hedgerows requires proper assessment. 5.6.7 It is also noted that the areas marked 'affected vegetation' would need careful review once available and it assumed that any additional works would be within the parameters of the approved OLEMP. 5.6.8 At Article 50(5) there is reference to consent having been deemed to be granted after 28 days. This is considered too short given the available resources and it is requested this period be extended to 42 days to allow for the appropriate consultation to take place with and to avoid the need to request extensions of time which	In practice, the term 'near' is intended to relate to, for example, roots that cross beneath the Order limits or canopies that cross over the Order limits and to which the inclusion in the draft Development Consent Order of an arbitrary distance would be impractical and potentially cause significant delays to the construction of the authorised development. A definition of near is not necessary because for the power to be exercised lawfully, the Applicant must consider it necessary to prevent an obstruction or interference with the construction, maintenance or operation of the authorised development and any associated apparatus, or from constituting a danger to persons construction, maintaining, or operating the authorised development. The article does not authorise the Applicant to do anything that is not necessary. The Applicant has already responded on the 28 day decision period elsewhere in this response and in its response to Relevant Representations and so does not repeat its justification here. Given affected vegetation and how it is affected is clearly shown on 2.16 Trees and Hedgerows to be Removed and/or Managed Plans [APP-048 to APP-055] (i.e. "affected managed" or "potentially affected", it is unclear why a definition of "affected vegetation" is required.

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has been the experience of the Authority when dealing with the discharge of Requirements under this Article on other NSIP schemes. 5.6.9 It is also considered the term 'affected vegetation' should be defined. 5.6.10 There is concern that as drafted, this section gives extensive powers and unless further defined in the Trees / Hedgerows to be Removed / Management Plans (i.e. to define limits to the extent of pruning of TPO beyond which prior approval would be required), the powers could result in harm to TPO trees with significant visual amenity. This will need to be reviewed once the Trees / Hedgerows to be Removed / Management Plans are submitted.	
Article 50 Felling or Lopping / 51 Trees subject to Tree Preservation Order Reinstatement and Compensation 5.6.11 Article 51 permits an undertaker to carry out extensive tree works to TP trees if it reasonably believes it is necessary to do so in connection with the implementation of the DCO and gives deemed consent to do so. Owing to the special importance of trees subject to TPOs, a definition of "near" is required for the avoidance of doubt (ideally defined as a specific value e.g. 2m for example, or as otherwise agreed). 5.6.12 Additional wording should also be included in this Article to the effect that advance notice of proposed works must be given to the Local Planning Authority and opportunity given for the planning authority to impose reasonable conditions (i.e.as to method of pruning/appropriate timing of tree work).	The Applicant refers to it response to ECC's comments on Article 50 above. The Applicant does not consider it necessary to include a notice provision and notes that such provisions are not included in other recent development consent orders, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024.
Article 56 Safeguarding 5.6.13 Article 56(3)(b) should be amended as follows: "they may not determine the application before the end of the period of 21 days, beginning five business days after the relevant planning authority has sent the notice to the undertaker by first class post or by such other means of service as may be agreed with the relevant planning	The Applicant does not follow why more than two business days is required in this instance. The Council's proposed drafting prevents them from determining the application for a further three business days than is proposed by the Applicant. The Applicant acknowledges ECC's position on Article 56(5).

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authority, which will be deemed to be the date on which the undertaker receives the notice or copy of the application.” This is to ensure that adequate time is offered for all parties engaged in the process. 5.6.14 ECC notes and accepts the following amend made to Article 56(5) “In determining an application for planning permission a relevant planning authority must take into account any representations received in accordance with this article”. 5.6.15 The term “business days” is used in this Article but not elsewhere in the dDCO. ECC recommends that all time limits are expressed consistently	The term “business days” is used elsewhere in the draft Development Consent Order.
Article 61 Service of Notices 5.6.16 It is acknowledged direct email contacts/ methods of service between the Essex Authorities and Undertaker to promote efficient communication is required with a preference for email communication.	The Applicant notes ECC’s position.
Requirement 1 - Interpretation 5.7.3 The definition of reinstatement planting needs to distinguish between replacement planting and what constitutes mitigation and compensation planting. 5.7.4 The definition of “start up and close down activities” is noted in its relevance to Requirement 7. A query is raised as to the level of potential noise which could be generated by these activities which may cause a noise disturbance to local communities. For example, it is not clear what is meant by “low key maintenance” and what this could involve. This matter is addressed further below concerning Requirement 7.	The Applicant notes the Council’s request for the definition of “reinstatement planting” to distinguish between replacement planting and what constitutes mitigation and compensation planting. However the Applicant does not agree that there is any need for terms to be distinguished within the definition of reinstatement, as the definition already refers back to the Outline (or final) Landscape and Ecological Management Plan where necessary terms are explained. The definition mirrors the definition in the National Grid (Bramford to Twinstead Reinforcement) Order 2024.
Requirement 3 - Stages of authorised development 5.7.5 Paragraph 3(1) should refer to “seven business days” to ensure consistency across the dDCO.	The Applicant disagrees. The use of days rather than business days in a small number of places in 3.1 Draft Development Consent Order [APP-056] is consistent with precedent DCOs, including The National Grid (Bramford to Twinstead Reinforcement) Order 2024 and The

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5.7.6 ECC's view is that submissions under this article to the relevant planning authority should be for approval as opposed to notification given the scale of the project and potential for cumulative impacts arising from the project. ECC thus requests that paragraph 3(1) is amended and "for approval" is added at end of the text at 3(2). 5.7.7 Paragraph 3(a) makes reference to "any revisions to the written scheme referred to in sub-paragraph (2) above must be submitted to the relevant planning authority in advance of the commencement of the stage of the authorised development to which the revisions relate" To avoid confusion and dispute, this paragraph should specify how far in advance this should be provided to the relevant planning authority to ensure they have due notice. 5.7.8 In respect of Paragraph 4 and the reference to 28 days, ECC requests the term 'days' is defined with Requirement 1.	National Grid (Yorkshire Green Enablement Project) Development Consent Order 2024. Seven days is consistent with the National Grid (Bramford to Twinstead Reinforcement) Order 2024. The Applicant cannot accept submissions under this article being for approval by the relevant planning authority. There are, amongst other things, specialist technical considerations and tight programme constraints that factor into the proposed stages and programming of the authorised development. Submitting these for approval risks severely delaying the Applicant's ability to begin construction of the development and to achieve energisation by 2030. The Applicant does not consider it necessary to provide a timescale on prior notice under paragraph 3(a). The approach in the draft Development Consent Order is consistent with that in the National Grid (Bramford to Twinstead Reinforcement) Order 2024. The Applicant is not clear why a definition of the term "days" would be necessary and does not propose to provide a definition.
Requirement 4 – Construction Environment Management Plans ECC seeks an explanation from the Applicant why it has not submitted a Construction Environment Management Plan ("CEMP"). The B2T DCO requires such a plan. It is not clear that a Code of Construction Practice (which is proposed) will provide the same sorts of protections as a CEMP. If it is intended to do so, in particular because of various outline plans appended to it, that should be made clear by the outline plans being listed. Furthermore, there are additional management plans which should be secured via this dDCO as detailed in section 6 of this LIR. Reference is made to "Natural England" within Paragraph 4(1) – however there are many stakeholders who should also be engaged in consultation on these management plans which should be reflected within this requirement, including the Local Highway Authority for example.	5.7.9. The Applicant has explained the structure of its management plans and why the Project does not require a CEMP above and in 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] and does not repeat that here. The outline management plans have been developed in consultation with a range of stakeholders. Relevant Stakeholders will be engaged with on the development of the full detailed versions of management plans and as part of our ongoing engagement with stakeholders we will review if others wish to be listed as consultees within this requirement. Requirement 1(2) provides that '<i>Where under any of the requirements the approval or agreement of the relevant planning authority or the relevant highway authority is required, that approval or agreement must be given in writing.</i>'

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At Paragraph 4(2), any agreement under this clause should be made in writing. Paragraph 4(3) should refer to the approved outline management plans. As above any agreement should be made in writing. Furthermore, there should be a record of how amendments and updates will be captured and recorded to ensure transparency. (Para 5.7.9-5.7.12)	It is not necessary to specify that this provision refers to the approved outline management plans as these are certified documents under Schedule 19. Appendix A of 1.3 Guide to the Application [REP1-001] provides a master document list and revision history of all submission documents which are available on the Planning Inspectorate's website. Any documents submitted to discharge Requirements post-consent will be available on the relevant planning authority's website.
Requirement 6 – Design and layout plans (elevations) ECC is concerned with the use of “general accordancy” and the subjectivity that would be involved in the assessment of whether any materially new or materially different environmental effects from those identified in the environmental statement have occurred which informs “general accordancy”. No explicit consideration is given to how some areas may be more sensitive to departures than others. The ES generally assumes the pylons as in the midline of the Limits of Deviation shown on the work plans. If a pylon is subsequently moved within those limits of deviation and closer to a receptor, but also higher, then there is likely to be a negative impact on said receptor experience of the development hence the concerns regarding the term “general accordancy” and the desire to restrict the limits of deviation expressed. ECC also considers that the host local planning authority should have a say in whether any changes from the design and layout plans give rise to any materially new or materially different environmental effects from those identified in the environmental statement. As such, the wording of paragraph 6(2) should be updated: The authorised development will not be in substantial accordancy with the design and layout plans (elevations) to the extent that any departure from the design and layout plans (elevations) in the opinion	The wording proposed has been selected to reflect the scale of the Project, the level of detailed design at the time, and to ensure sufficient flexibility in design to respond to such final design proposals as will be agreed with the relevant authority as prescribed in 3.1 Draft Development Consent Order [APP-056]. As part of the process, the authority will be able to form a view as to whether any proposals submitted for approval will give rise to any materially new or different environmental effects beyond those identified in the Environmental Statement and the extent to which any effects are acceptable within the terms of 3.1 Draft Development Consent Order [APP-056]. The Applicant notes the Council's comments regarding concerns with the limits of deviation, but reiterates that the Applicant has assessed the limits of deviation as part of the Environmental Statement and therefore restrictions to the limits of deviation are not necessary.

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of the Local Planning Authority gives rise to any materially new or materially different effects... ECC considers this could operate by way of a prior approval process similar to that in effect for many areas of the TCPA regime.	
Requirement 10 – Reinstatement schemes ECC notes the repeated reference to ‘former use’ within this part of the DCO and questions whether this should be defined to ensure that there is clarity around what is considered a ‘former use’ of a site. There needs to be clarity around who determines what the former use of a site, alongside any enforcement actions around this. It is therefore suggested that ‘former use’ is defined as “the condition and appearance of the land prior to the commencement of the development” Requirement 10(2) – ECC notes the exclusion from the reinstatement requirement of land within 10 metres of any underground cables. It would be helpful to clarify what will happen to this land.	The Applicant will consider the Council’s proposed drafting in the revision of the draft Development Consent Order to be submitted at Deadline 3. The presence of underground cables affects the development and planting that can occur above and adjacent to it, within the specified 10 m area either side of the cable. In particular, trees cannot be planted above cable corridors as the roots can damage the cables or dry out the land which affects the cables, and this is not an acceptable risk for infrastructure that is part of the national transmission system. Similarly, developments such as lean-to agricultural structures or buildings can be erected without the need for planning permission and may not be appropriate to construct or reinstate over underground cables. Therefore, a blanked requirement to reinstate land suitable for its former use should not apply to land within 10 m of the cables.
Requirement 13 – Decommissioning ECC would welcome more detail around the decommissioning process, especially any impacts arising on communities and the local environment. There is an expectation for restoration to contribute to sustainable land stewardship, climate change mitigation and adaptation, biodiversity and environmental net gain through the delivery of natural GI. If the restoration proposal is to return the site to arable land it will need to a better grade than before and demonstrate how it will deliver sustainable land stewardship with potential to link to Landscape recovery.	

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Suggested Additional Requirements	Requests for additional Requirements are addressed elsewhere in Chapter 3 Draft Development Consent Order, Requirements and Management Plans and are not addressed further here.
5.8 Schedule 4 Discharge of Requirements Applications made under Requirements At Paragraph 1(1) LPA's are required to give notice of their decision on the discharge of requirements within 28 days. This is considered too short given the available resources and the processes involved in the discharge of Requirements, some of which will no doubt be complex and supported (properly) by a lot of detailed information. This period should be extended to at least 56 days. This is consistent with the statutory determination period for the discharge of conditions under the TCPA regime. In addition, at Paragraph 1(1)(b) where further information is required, the Clause should be altered from the day immediately following the date the information was supplied by the undertaker to the day after the receipt by the local planning authority of the further information. Further information At Paragraph 2 (2), the timescale should be increased to at least seven business days consistent with that specified in the Bramford to Twinstead DCO. At Paragraph 2 (3) the timescales for the local planning authority to issue the consultation following the receipt of information / additional information should be increased to ten business days. In addition, the backstop date by which the relevant authority must notify the undertaker should be increased to ten business days after the 21-day consultation period or the receipt of the Requirement Consultees response requesting the need for additional information. This is to reflect the pressure on resources of likely required consultees and to the relevant authority having to seek an extension.	The Applicant has provided its justification for the various timescales raised in this comment earlier in this document and in 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] and does not repeat that here. The Applicant expects to provide further information electronically, so the submission and receipt of the information is expected to occur at the same time in practical terms. It is therefore not anticipated that there is any merit in amending the drafting here. The drafting in paragraph 5.8.5 is consistent with recently made development consent orders. However, the Applicant will consider the point raised on notification of consultees and will provide an update at Deadline 3. The Applicant considers that the existing drafting provides appropriate flexibility, but has been, and continues to be, committed to collaborative working with the relevant authorities and will continue to engage on these matters throughout Examination and post consent should development consent be granted.

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The burden on LPA's could be further reduced if the Undertaker were to notify the Requirement Consultee directly at same time as LPA so ECC. suggests discussion with the Applicant as to how that could work. ECC is concerned about the process where the supplied information is not acceptable. While Schedule 4 paragraphs 2 and 3 deals with some aspects of that, it does not address circumstances where ECC only knows what further information is required once it has received comments from consultees. and does not address the issue. It is therefore suggested that: In Schedule 4 Paragraph 2, replace," the relevant authority must, within 5 days of receipt of the application" with "the relevant authority must, within 21 days of receipt of the application; In Schedule 4 Paragraph 3 delete "and in any event within 21 days of the receipt of the application" is deleted from Paragraph 3 of this Schedule. (Para 5.8.1-5.8.6)	
Fees 5.8.7 ECC is giving further consideration to what the specified fee at part 3(b) should be and its relationship to prescribed fees and any post consent PPA and will update the Applicant and the ExA as soon as practicable. 5.8.8 The period within which the application has to be determined should be increased to 42 days, as should the period for the refund This more realistically reflects the processing time which will be needed to carry out the necessary consultation key consultees and for them to consider the submitted information which on a project of this scale will no doubt be extensive and detailed. This situation is further exacerbated by the number of DCO's may LPA's are currently having to process.	The Applicant has updated the proposed fee to align with the current national guidance. The Applicant has responded on determination periods earlier in this document and in 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] and does not repeat its position here, save to reinforce the point that extending determination periods has potential to significantly delay the delivery of the Project. The Applicant will consider the Council's proposal of a refund retention and will provide an update at Deadline 3. The Applicant does not consider it appropriate to index link the application fee. Application fees for recently made development consent orders do not require indexation (see, for example, the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and

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5.8.9 Any refund of application fee should be subject to a 20% retention to cover the initial administration costs of processing the submission. 5.8.10 The dDCO should clarify whether the fees will be index linked.	the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.
Schedule 16 Protective Provisions Part 3 for the protection of drainage and flood authorities Approval of Plans Paragraph 3(1)(a) – The Lead Local Flood Authority recommends the inclusion of approval under Section 23 of the Land Drainage Act 199. Furthermore, with reference to Paragraph 3(6), where the drainage strategy plan changes the LLFA should be consulted regarding the changes at the earliest opportunity to ensure there is adequate time to consider any request. A minimum of 20 business days is suggested. (Para 5.9.1-5.9.2)	The Applicant is considering whether the proposed drafting changes to Part 3 of Schedule 16 (protective provisions for the protection of drainage and flood authorities) can be included in the draft Development Consent Order at Deadline 3.
Part 4 for the protection of the highway authorities As mentioned previously, ECC's preference is to enter into a Framework Highways Agreement or similar side agreement with the Applicant to deal with the design approvals rather than the use of Protected Provisions. This is on the basis that ECC expect (as indeed the public would expect) a level of oversight and control of the local highway network. However, we have provided comments on the text in the dDCO should the Protected Provisions be the only route available. The "Approval period" is defined as 14 days for Minor Works and 28 days for Major Works. ECC refer to the discussion points around this at Schedule 11 where ECC have requested that the formal decision period is extended to 35 days to be in line with the Bramford to Twinstead DCO. A description of the types of work that constitutes "early works" is needed as is shown for the pre-commencement definition.	It is the Applicant's understanding that as noted the highways authorities are seeking a joint highways framework agreement in lieu of protective provisions, which the Applicant will seek to negotiate with the highways authorities provided it can be concluded before the end of the Examination. A draft of this agreement was shared on the week commencing 23 February 2026 (along with updated Protective Provisions to reflect Essex County Council's comments which are summarised in ECC's Local Impact Report) to all the Highways Authorities and we await comments. In the absence of a Framework Agreement, the Applicant is considering the comments raised by the Council.

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The agreed wording from the recently consented Five Estuaries DCO (Protected Provisions, Article 131) should be included for the definition of "road safety audits": "(1) The undertaker must procure that an appropriately qualified RSA team (as defined in HPN039 or DMRB Volume 5 Section 2 Part 2 (GG 119) as advised by the local highway authority (acting reasonably) or any replacement or modification of that standard) undertakes road safety audit in accordance with the standard as set out in HPN039 or DMRB standard GG 119 as advised by the local highway authority (acting reasonably) for works which involve creation, alteration, expansion or other modifications of the local highway but not for works which consist only of trenchless installation beneath highways, and must provide copies of the reports of such audits to the local highway authority within 10 business days of their receipt by the undertaker. The local highway authority must be invited to participate in the road safety audit conducted under sub-paragraph (1) No works on a local highway must be commenced out until a satisfactory Stage 1 and Stage 2 Road Safety Audit has been carried out and all reasonable recommendation raised by them or any exceptions are approved by the local highway authority (acting reasonably) Where the report of the stage 3 and 4 road safety audit identifies any recommended measures in respect of the local highway, the undertaken must carry out, at its own expense and to the reasonable satisfaction of the local highway authority, those measures identified as part of stage 3 and 4 audit which the undertaker considers necessary (acting reasonably) and for the avoidance of doubt any matters related to the health and safety will be considered as reasonable, and which do not give rise to any new or materially different environmental effects in comparison with those identified in the environmental statement."	

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The definition of “security” includes either (a) a letter of credit; or (b) such other information that evidences the credit standing of the undertaker. This is a non-standard way for ECC to deal with the form of security which is usually required as a bond. ECC notes the Applicant's solicitors were reviewing the form of security through ongoing internal discussions and the drafting was to be updated accordingly where necessary. It does not appear that there have been changes made and the Explanatory Memorandum (Document 3.2) offers no further detail on this point. At paragraph 6 (2) ECC requests that a timescale is included to provide notice to the local authority on pre-commencement works. Currently the statement is vague. Paragraph 8 requires wording to be added around suitably qualified persons to be involved in the initial and formal engagement with the local highway authority. ECC have had previous experience on other DCOs where there was a lack of knowledge of the design which meant that ECC were having to spend more time dealing with issues. Therefore, we believe this requirement should be tightened up. Paragraph 11 (1b) sets out that the formal approval can only commence when the initial checking fee has been paid. It would appear reasonable to include this requirement in paragraph 10 such that the fee is paid in advance of the time involved for the initial engagement. (Para 5.9.3-5.9.10)	
5.10 Schedule 19 Certified Documents 5.10.1 The dDCO should secure that certified documents remain readily available to local authorities engaged in the discharge of requirement, in the interests of clarity, efficiency of process and transparency.	The documents to be certified will be available on the Planning Inspectorate's website.

Norfolk County Council

Table 3.24 Norfolk County Council – Applicant’s Response to Local Authority comments on the draft DCO

Response to Norfolk County Council’s Table 4-A: Proposed substantive changes to articles and Requirements				
Insertion/deletion or amendment	Original text	Proposed change	Explanation of change	Applicant’s Response
Delete in paragraph (1) of article 2. Insert after definition of “provisional advance authorisation” in paragraph (1) of article 2.	“relevant planning authority” means, in any given provision of this Order, the local planning authority for the area to which the provision relates;	~~“relevant planning authority” means, in any given provision of this Order, the local planning authority for the area to which the provision relates;~~ <u>“relevant county planning authority” means, in any given provision of this Order, the county planning authority for the area to which the provision relates;</u> <u>“relevant district planning authority” means, in any given provision of this Order, the district planning authority for the area to which the provision relates;</u>	The meaning of “relevant planning authority” in the requirement is ambiguous. It is defined in article (1) as meaning “in any given provision of this Order, the local planning authority to which the provision relates”. Section 235 of the Planning Act 2008 gives “local planning authority” the same meaning as in the Town and Country Planning Act 1990. Section 1 of the Town and Country Planning Act 1990 states that references in the planning Acts to a local planning authority in relation to a non-metropolitan county shall be construed, subject to any express provision to the contrary, as references to both the county	The Applicant notes that the approach to defining the “relevant planning authority” is common across a number of made development consent orders, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. The Applicant has amended some of the provisions in the draft Development Consent Order to refer to the “relevant discharging authority”, which is defined in paragraph 1(1) of Schedule 3, however, the Applicant will consider fully NCC’s proposed drafting amendments (and consequential

Response to Norfolk County Council's Table 4-A: Proposed substantive changes to articles and Requirements

Insertion/deletion or amendment	Original text	Proposed change	Explanation of change	Applicant's Response
			planning authority and the district planning authorities. Because there is no express provision to the contrary in either the Planning Act 2008 or the draft DCO, the term "relevant planning authority" refers to both types of planning authority. NCC considers that this is imprecise and unhelpful and that the draft DCO should specify which local planning authority is meant in each instance.	amendments on this point and whether these can be incorporated into the draft Development Consent Order at Deadline 3. This response also applies to Table 5-A – Consequential changes as a result of disambiguating the referent of "relevant planning authorities", of NCC's Local Impact Report and so we do not repeat our comments there.
Amend paragraph (1) of article 11.	(1) The undertaker may, for the purposes of the authorised development, or for purposes ancillary to it, enter upon so much of any of the streets specified in column (2) of Schedule 5 (streets subject to street works) as is within the Order limits and may without the consent of the street authority—	(1) The undertaker may, for the purposes of the authorised development, or for purposes ancillary to it, enter upon so much of any of the streets specified in column (2) of Schedule 5 (streets subject to street works) as is within the Order limits and may ~~without~~ <u>subject to the</u> consent of the street	As set out in our relevant representation, without a suitable highways side agreement or protective provisions, article 11(1) should be subject to the consent of the street authority. NCC cannot accept the grant of powers to undertakers which could unilaterally interfere with our ability to perform our	As noted in the Applicant's Comments on Relevant Representations, the Applicant has incorporated draft protective provisions into 3.1 Draft Development Consent Order [APP-056] ('the draft DCO') and has sought engagement with the relevant highway authorities on these provisions. The Applicant

Response to Norfolk County Council's Table 4-A: Proposed substantive changes to articles and Requirements

Insertion/deletion or amendment	Original text	Proposed change	Explanation of change	Applicant's Response
	[...]	authority <u>which may attach reasonable conditions to any consent</u> — [...]	functions as street authority. The reference to the street authority's ability to attach reasonable conditions is proposed to make this implicit ability explicit, following the language of current article 16(5)(b).	will continue to engage with the authority throughout the Examination process and therefore at this stage it does not consider NCC's proposed amendments to the draft DCO to be necessary.
Amend paragraph (2) of article 11.	(2) Without limiting the scope of the powers conferred by paragraph (1) but subject to the consent of the street authority, which consent must not be unreasonably withheld or delayed, the undertaker may, for the purposes of the authorised development, or for purposes ancillary to it, enter on so much of any other street whether or not within the Order limits, for the purposes set out at paragraph (1)(a) to (j) and paragraph (3) of article 8	(2) Without limiting the scope of the powers conferred by paragraph (1) but subject to the consent of the street authority, which consent must not be unreasonably withheld or delayed <u>and to which consent the street authority may attach reasonable conditions</u> , the undertaker may, for the purposes of the authorised development, or for purposes ancillary to it, enter on so much of any other street whether or not within the Order limits, for the purposes set out at paragraph (1)(a) to (j) and	The reference to the street authority's ability to attach reasonable conditions is proposed to make this implicit ability explicit, following the language of current article 16(5)(b) but modified to fit the grammatical context.	The Applicant notes NCC's request for consistency across those articles which require the Applicant to obtain the relevant street or highway authority's consent before carrying out works on streets on otherwise identified in the Schedules to the draft Development Consent Order and is considering the proposed updates to the draft Development Consent Order.

Response to Norfolk County Council's Table 4-A: Proposed substantive changes to articles and Requirements

Insertion/deletion or amendment	Original text	Proposed change	Explanation of change	Applicant's Response
	(application of the 1990 Act) applies.	paragraph (3) of article 8 (application of the 1990 Act) applies.		
Amend paragraph (4) of article 14. (<i>cont.</i>)	(4) The powers conferred by paragraph (2) may not be exercised without the consent of the street authority (such consent not to be unreasonably withheld or delayed).	(4) The powers conferred by paragraph <u>s</u> <u>(1) and</u> (2) may not be exercised without the consent of the street authority, <u>which may attach reasonable conditions to any consent</u> (such consent not to be unreasonably withheld or delayed).	As set out in our relevant representation, without a suitable highways side agreement or protective provisions, article 14(1) should be subject to the consent of the street authority. NCC cannot accept the grant of powers to undertakers which could unilaterally interfere with our ability to perform our functions as street authority. The reference to the street authority's ability to attach reasonable conditions is proposed to make this implicit ability explicit, following the language of current article 16(5)(b).	The Applicant notes NCC's request for consistency across those articles which require the Applicant to obtain the relevant street or highway authority's consent before carrying out works on streets on otherwise identified in the Schedules to the draft Development Consent Order and is considering the proposed updates to the draft Development Consent Order.
Amend paragraph (5) of article 16.	(5) The undertaker must not temporarily close, alter or divert— (a) any street or public right of way	(5) The undertaker must not temporarily close, alter or divert— (a) any street or public right of way specified as	As set out in our relevant representation, without a suitable highways side agreement or protective provisions, article 16(5)	As noted in the Applicant's Comments on Relevant Representations, the Applicant has incorporated draft protective provisions

Response to Norfolk County Council's Table 4-A: Proposed substantive changes to articles and Requirements

Insertion/deletion or amendment	Original text	Proposed change	Explanation of change	Applicant's Response
	specified as mentioned in paragraph (4) without first consulting the street authority; or b. any other street or public right of way without the consent of the street authority (such consent not to be unreasonably withheld or delayed).	mentioned in paragraph (4) ~~without first consulting the street authority~~; or -(b) any other street or public right of way, without the consent of the street authority (such consent not to be unreasonably withheld or delayed) which may attach reasonable conditions to any consent.	should be subject to the consent of the street authority. NCC cannot accept the grant of powers to undertakers which could unilaterally interfere with our ability to perform our functions as street authority. This change would mean that both (a) and (b) are subject to consent of the street authority.	into 3.1 Draft Development Consent Order [APP-056] ('the draft DCO') and has sought engagement with the relevant highway authorities on these provisions. The Applicant will continue to engage with the authority throughout the Examination process and therefore at this stage it does not consider NCC's proposed amendments to the draft DCO to be necessary.
Amend paragraph 1(1) of Schedule 4 (discharge of requirements)	(1) Where an application has been made to a relevant authority for any consent, agreement or approval required by a Requirement (including consent, agreement or approval in respect of part of a Requirement), the relevant authority must give notice to the undertaker of its decision on the application within a	(1) Where an application has been made to a relevant authority for any consent, agreement or approval required by a Requirement (including consent, agreement or approval in respect of part of a Requirement), the relevant authority must give notice to the undertaker of its decision on the	The timescales in schedule 4 are too short and should be changed so that they are at least no shorter than those set out in PINS' Advice Note Fifteen: drafting Development Consent Orders, which is 42 days or, preferably, 56 days accounting for the unusually high volume of	Whilst the Applicant acknowledges its decision period is shorter than the example set out in Advice Note 15, the Applicant's position remains that a 28-day decision-making timeframe is proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project,

Response to Norfolk County Council's Table 4-A: Proposed substantive changes to articles and Requirements

Insertion/deletion or amendment	Original text	Proposed change	Explanation of change	Applicant's Response
	period of 28 days beginning with— [...]	application within a period of ~~28~~ <u>56</u> days beginning with—[...] [...]	NSIPs being handled in Norfolk. NCC finds the justification for shorter timescales given in the draft Explanatory Memorandum (that 'shorter time limits are necessary and proportionate in light of the immediate and pressing national need which the Project is intended to address') to be unconvincing given that longer periods are well precedented for other projects which also meet an urgent need as defined by NPS EN-1. See, for example, paragraph 1 of part 2 of Schedule 2 of the Sheringham Shoal and Dudgeon Extensions Offshore Wind Farm Order 2024 (56 days), paragraph 1(2) of Schedule 24 (procedure for approvals, consents and appeals) of the Sizewell C Nuclear Generating Station Order 2022 (eight weeks), and	which is of critical importance to the UK government's Clean Power Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. A decision period of 56 days would be disproportionate for the consents sought and risks considerable delay to the delivery programme. Furthermore, Annex 2 of the National Energy System Operator's (NESO) Clean Power 2030 Report published in November 2024 identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the

Response to Norfolk County Council's Table 4-A: Proposed substantive changes to articles and Requirements

Insertion/deletion or amendment	Original text	Proposed change	Explanation of change	Applicant's Response
			paragraph 2(2) of Schedule 16 (procedure for the discharge of requirements) of the Tillbridge Solar Order 2025 (ten weeks).	energisation of the Project is delayed into 2031. In each instance, the draft DCO allows for the relevant decision-making authority and the undertaker to agree 'such other period' as may be appropriate in the circumstances.
Insert new requirement 15. - after requirement 14. in Schedule 3 (requirements)		<u>15. Construction surface water drainage strategy</u> <u>1.No stage of the authorised development may commence until a construction surface water drainage strategy for that stage which accords with the outline construction surface water drainage strategy has been submitted to and approved in writing by the relevant district planning authority in consultation with the relevant county planning authority.</u> <u>2.All construction works for each stage of the</u>	This change would implement NCC's request to require an employment and skills plan as detailed in section 10 of the LIR. Note that this would require the applicant to produce an outline construction surface water drainage strategy before the end of the examination. A consequent amendment would need to be made to add the outline construction surface water drainage strategy to Schedule 19 (certified documents).	The Applicant addresses this comment earlier in this section (Development Consent Order, Requirements and Management Plans) of this document and so we do not comment further here, save to say that any consequential drafting will be considered as part of the revisions to the draft Development Consent Order for Deadline 3.

Response to Norfolk County Council's Table 4-A: Proposed substantive changes to articles and Requirements

Insertion/deletion or amendment	Original text	Proposed change	Explanation of change	Applicant's Response
		<u>authorised development must be carried out in accordance with the construction surface water drainage strategy for that stage unless otherwise agreed with the relevant district planning authority in consultation with the relevant county planning authority.</u> <u>(3) For the avoidance of doubt, all pre-commencement operations must be carried out in accordance with the outline construction surface water drainage strategy unless otherwise agreed with the relevant district planning authority in consultation with the relevant county planning authority.</u>		
Insert new requirement 16. - after new requirement 15. at the end of Schedule 3 (requirements)		<u>16. Employment and skills plan</u> <u>1.No stage of the authorised development may commence until an employment and skills</u>	This change would implement NCC's request to require an employment and skills plan as detailed in section 12 of the LIR.	The Applicant addresses this comment in the Socio-economics, Recreation and Tourism - Employment, Skills, Training and Local Supply

Response to Norfolk County Council's Table 4-A: Proposed substantive changes to articles and Requirements

Insertion/deletion or amendment	Original text	Proposed change	Explanation of change	Applicant's Response
		<u>plan for that stage which accords with the outline employment and skills plan has been submitted to and approved in writing by the relevant county planning authority.</u> <u>2.The employment and skills plan must be implemented as approved.</u>	Note that this would require the applicant to produce an outline employment and skills plan before the end of the examination. A consequent amendment would need to be made to add the outline employment and skills plan to Schedule 19 (certified documents)	Chain section of this document and so we do not comment further here, save to say that any consequential drafting will be considered as part of the revisions to the draft Development Consent Order for Deadline 3.

Response to Norfolk County Council's Table 5-A: Consequential changes as a result of disambiguating the referent of "relevant planning authorities"

Insertion/deletion or amendment	Original text	Proposed change	Explanation of change	Applicant's Response
Amend requirement 4. (construction management plans) of Schedule 3 (requirements)	4. Construction Management Plans 1. No stage of the authorised development may commence until, for that stage, the following plans as relevant to that stage have been submitted to and approved by the relevant planning	4. Construction Management Plans (1) No stage of the authorised development may commence until, for that stage, the following plans as relevant to that stage have been submitted to and approved by the relevant <u>district</u> planning authority	This change resolves the ambiguity of which local planning authority is the "relevant planning authority" and further reduces ambiguity by removing references to any "other discharging authority as may be appropriate".	The Applicant is considering whether the proposed changes, which include express reference to particular consultees, can be included in the updated draft Development Consent Order at Deadline 3.

Response to Norfolk County Council's Table 5-A: Consequential changes as a result of disambiguating the referent of "relevant planning authorities"

Insertion/deletion or amendment	Original text	Proposed change	Explanation of change	Applicant's Response
	authority (in consultation with Natural England in the case of the landscape and ecological management plan) or other discharging authority as may be appropriate to the relevant plan concerned. The relevant plans are— a) code of construction practice (which must be substantially in accordance with the outline code of construction practice); b) construction traffic management plan (which must be substantially in accordance with the outline construction traffic management plan); c) landscape and ecological management plan	~~(in consultation with Natural England in the case of the landscape and ecological management plan) or other discharging authority as may be appropriate to the relevant plan concerned.~~ The ~~relevant~~ plans are— a) code of construction practice (which must be substantially in accordance with the outline code of construction practice; b) construction traffic management plan (which must be substantially in accordance with the outline construction traffic management plan); c) landscape and ecological management plan (which must be substantially in accordance with the	This is enabled by introducing a new paragraph which sets out a relevant consultee for each plan and reserving the role of discharging authority for the relevant district planning authority.	

Response to Norfolk County Council's Table 5-A: Consequential changes as a result of disambiguating the referent of "relevant planning authorities"

Insertion/deletion or amendment	Original text	Proposed change	Explanation of change	Applicant's Response
	(which must be substantially in accordance with the outline landscape and ecological management plan); d) public rights of way management plan (which must be substantially in accordance with the outline public rights of way management plan);	outline landscape and ecological management plan); d) public rights of way management plan (which must be substantially in accordance with the outline public rights of way management plan);		
	2. All construction works for each stage of the authorised development must be carried out in accordance with the approved plans referred to in paragraph (1), unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan concerned.	<u>(2) The approval of the discharging authority is to be given in consultation with the relevant consultee for that plan. The relevant consultees are—</u> a) <u>the relevant county planning authority for the code of construction practice;</u> b) <u>the relevant highway authority for the construction traffic management plan;</u> c) <u>Natural England for the landscape and</u>		

Response to Norfolk County Council's Table 5-A: Consequential changes as a result of disambiguating the referent of "relevant planning authorities"

Insertion/deletion or amendment	Original text	Proposed change	Explanation of change	Applicant's Response
	3. For the avoidance of doubt, all pre-commencement operations must be carried out in accordance with the outline code of construction practice, the outline construction traffic management plan, the outline landscape and ecological management plan and the outline public rights of way management plan unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan concerned.	<u>ecological management plan;</u> d) <u>the relevant county planning authority for the public rights of way management plan.</u> (23) All construction works for each stage of the authorised development must be carried out in accordance with the approved plans referred to in paragraph (1), unless otherwise agreed with the relevant <u>district</u> planning authority ~~or other discharging authority as may be appropriate to the relevant plan concerned.~~ (34) For the avoidance of doubt, all pre-commencement operations must be carried out in accordance with the outline code of construction practice, the outline construction traffic management plan, the		

Response to Norfolk County Council's Table 5-A: Consequential changes as a result of disambiguating the referent of "relevant planning authorities"

Insertion/deletion or amendment	Original text	Proposed change	Explanation of change	Applicant's Response
		outline landscape and ecological management plan and the outline public rights of way management plan unless otherwise agreed with the relevant <u>district</u> planning authority ~~-or other discharging authority as may be appropriate to the relevant plan concerned.~~		
Amend paragraph (1) of requirement 5. of schedule 3 (requirements)	(1) No stage of the authorised development may commence until either a preservation in situ management plan, or a detailed written scheme of investigation of areas of archaeological interest relevant to that stage (if any), as identified within the outline archaeological mitigation strategy and outline written scheme of investigation or identified through evaluation work as set out in the outline archaeological mitigation strategy and outline written scheme of investigation,	(1) No stage of the authorised development may commence until either a preservation in situ management plan, or a detailed written scheme of investigation of areas of archaeological interest relevant to that stage (if any), as identified within the outline archaeological mitigation strategy and outline written scheme of investigation or identified through evaluation work as set out in the outline archaeological mitigation strategy and outline written scheme of	This change would reduce ambiguity by making the relevant district planning authority the discharging authority in all cases, including those in which Historic England are relevant. The proposed drafting requires consultation with the relevant county planning authority, because county planning authorities host specialist archaeological officers and maintain the historic environment record. NCC presume that Historic England would be	The Applicant has updated Requirement 5 of the draft Development Consent Order to refer to Historic England as a consultee rather than a discharging authority.

Response to Norfolk County Council's Table 5-A: Consequential changes as a result of disambiguating the referent of "relevant planning authorities"

Insertion/deletion or amendment	Original text	Proposed change	Explanation of change	Applicant's Response
	has been submitted to and approved by the relevant planning authority and, if relevant, Historic England.	investigation, has been submitted to and approved by the relevant <u>district</u> planning authority <u>in consultation with the relevant county planning authority</u> and, if relevant, Historic England.	relevant in cases affecting scheduled ancient monuments, but this isn't clear on the face of the order. NCC would ask the applicant to consider whether this should be set out explicitly. NCC's proposed change would make Historic England a consultee rather than a discharging authority to simplify discharging arrangements. If the applicant would prefer to retain Historic England as a discharging authority in certain circumstances, NCC would request that the applicant propose an amendment which would make clear the circumstances in which Historic England are the discharging authority and which makes county planning authorities mandatory consultees.	

Response to Norfolk County Council's Table 5-A: Consequential changes as a result of disambiguating the referent of "relevant planning authorities"

Insertion/deletion or amendment	Original text	Proposed change	Explanation of change	Applicant's Response
Amend paragraph (4) of requirement 5. of schedule 3 (requirements)	(4) For the avoidance of doubt, all pre-commencement operations must be carried out in accordance with the outline archaeological mitigation strategy and outline written scheme of investigation, unless otherwise agreed with the relevant planning authority and, if relevant, Historic England.	(4) For the avoidance of doubt, all pre-commencement operations must be carried out in accordance with the outline archaeological mitigation strategy and outline written scheme of investigation, unless otherwise agreed with the relevant <u>district</u> planning authority <u>in consultation with the relevant county planning authority</u> and, if relevant, Historic England.	This change is required as a consequence of the above proposed change.	The Applicant has updated Requirement 5 of the draft Development Consent Order to refer to Historic England as a consultee rather than a discharging authority.

Suffolk County Council and Babergh & Mid-Suffolk

Table 3.25 Suffolk County Council, Babergh District Council and Mid Suffolk District Council – Applicant’s Response to Local Authority comments on the draft DCO

Suffolk County Council and Babergh & Mid-Suffolk Statement	Applicant’s Response
Article 3(6) (development consent etc. granted by the Order) – this provision states that the development consent granted by the Order allows works (including demolition of buildings or other structures) within the Order limits to the extent they “relate to, are required by or are incidental to the carrying out of the authorised development”. This is a broad power which does not appear to have been included in the precedents cited by the applicant in paragraph 1.2.5 of the EM [APP- 057]. It will be remembered that paragraph 1.2 of <i>Advice Note Fifteen: drafting Development Consent Orders</i> states: “A thorough justification should be provided in the Explanatory Memorandum for every Article and Requirement, explaining why the inclusion of the power is appropriate in the specific case. The extent of justification should be proportionate to the degree of novelty and/ or controversy in relation to the inclusion of that particular power”. [Emphasis added]. Contrary to the advice, here, no justification for this provision is included in the EM (see paragraph 1.2.5 of the EM [APP-057]). To allow SCC to understand the need for this provision, SCC requests that the next draft of the EM is updated to include justification for this provision. It would also be helpful to know which buildings within SCC’s administrative are proposed to be demolished.	The Applicant has not currently identified any buildings that would need to be demolished. If demolition was to be required, it would be due to unforeseen circumstances. The Applicant is considering SCC’s representation and will provide an updated draft 3.2 Explanatory Memorandum [APP-057] at Deadline 3.
Article 12(2)(d) (application of the permit schemes) – this provision prohibits “the relevant street authority” from permitting certain works at a certain time but then says “local highway authority” may grant a permit for immediate works. Should those references be to the same body? If not, why not? Also, the term “local highway	The Applicant responded to this representation in its response to SCC’s relevant representations in the following terms: National Grid notes SCC’s comments and is content to amend Article 12(2)(d) of 3.1 Draft Development Consent Order [APP-056] (draft

Suffolk County Council and Babergh & Mid-Suffolk Statement	Applicant's Response
authority” is not used elsewhere in the dDCO (save in a single definition) and is not a defined term itself. In articles 12(3), (4) and (5) “the relevant highway authority” referred to and SCC wonders whether that term should also be used (whether once or twice) in article 12(2)(d). SCC would welcome the applicant’s explanation on this drafting point.	DCO) in order to refer in both instances to ‘the relevant highway authority’. The Applicant has updated the draft DCO accordingly.
Article 23 (removal of human remains) – as drafted, this article raises significant concern for SCC’s Archaeological Service (“SCCAS”), particularly in respect of the way in which archaeological human remains will be treated. As drafted, the article poses a risk to archaeological heritage assets and threatens to delay the project. SCCAS understands there are no records of any historic human remains or burial sites within the Order Limits in Suffolk. However, it is not uncommon for human remains to be encountered during archaeological fieldwork, and a project of this scale should anticipate the potential discovery of such remains during ongoing evaluation and mitigation. SCCAS considers article 23 conflicts with archaeological best practice for dealing with human remains in archaeological contexts as it would lead to burial features being exposed for an extended period, constituting a risk of damage or harm. For remains over 100 years old, it is usually standard archaeological practice that the terms of the Burial Act 1857 are followed; however, by article 23(17), section 25 of the Burial Act 1857 is disapplied in respect of a removal carried out in accordance with article 23. SCCAS considers article 23 should be amended so that the removal of remains considered to be over 100 years old should be carried out in line with the Burial Act 1857, any issued burial license, the relevant detailed written scheme of investigation, and best practice documents. SCCAS therefore recommends that article 23 is amended as follows —	The Applicant notes the authorities’ comments on Article 23 (removal of human remains) of the draft Development Consent Order and will consider whether drafting amendments are appropriate and necessary for inclusion in the revised draft Development Consent Order that will be submitted at Deadline 3.

Suffolk County Council and Babergh & Mid-Suffolk Statement	Applicant's Response
“(17) Subject to subject to paragraph (17)A, section 25 of the Burial Act 1857 (offence of removal of body from burial grounds) does not apply to a removal carried out in accordance with this article. (17A) Subject to paragraph (17B), the disapplication mentioned in paragraph (17) does not apply to the removal of human remains where the undertaker is satisfied that the remains were interred more than 100 years ago. (17B) A removal to which paragraph (17A) applies must also be carried out in accordance with any issued burial license, any relevant detailed written scheme of investigation approved in accordance with requirement 5 (archaeology), and best practice documents”. SCCAS requests that the Applicant engages with SCCAS in respect of the drafting of this article.	
Article 34(1) (time limit for exercise of authority to acquire land and rights compulsorily) – SCC considers allowing the applicant seven years to issue ‘notices to treat’ or a ‘general vesting declaration’ to acquire the land or rights that is subject to the power of compulsory purchase is excessive. Five years is the usual position and SCC considers the usual position should be adopted here, especially since (per article 34(4)) that period will not be affected by any legal challenge to the decision to grant development consent for the project. Moreover, per requirement 2(1) (time limits) the undertaker has five years to commence the authorised development and SCC would usually expect the period in article 34(1) to be same as the period included in the requirement. For example, in the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958), the time limit in the relevant provisions is the same i.e. 5 years (see article 32(1) (time limit for exercise of authority to acquire land and rights compulsorily)) and requirement 2(1) (time limits). The same applies to the recently made Sunnica Energy Farm Order 2024 (SI 2024/802) (see article 18(1) and requirement 2(1)) and the Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853)	The Applicant responded to this representation in its response to SCC’s relevant representations in the following terms: National Grid refers to the justification already provided in Paragraph 3.38.1 of 3.2 Explanatory Memorandum [APP-057]: <i>‘When paired with the programme and nature and scale of the Project, National Grid is of the view that seven years is justified. A period of seven years is precededented in other Orders, including the East Anglia ONE North Offshore Windfarm Order 2022 and the East Anglia TWO Offshore Windfarm Order 2022. The Statement of Reasons (document reference 4.1) provides further details on compulsory acquisition and time limits.’</i> The Applicant notes the authorities’ comments on the “usual position”, but reiterates that for a project of this nature and scale, its position remains that seven years is proportionate and justified.

Suffolk County Council and Babergh & Mid-Suffolk Statement	Applicant's Response
(see article 31 and requirement 1), both of which are located in Suffolk.	
Article 49(5) (traffic regulation) – this provision refers to the “instrument” made under paragraph (1), (2) or (3) of article 49. SCC considers it would be helpful if a copy of the made instrument were made available by the undertaker and sent to SCC. In the light of this, SCC would suggest a new article 49(13) is included as follows – “(13) A copy of the instrument referred to in paragraph (5) must be held at the registered office address of the undertaker for inspection during normal working hours and, as soon as reasonably practicable after being made, a copy must be served on the highway authority”.	The Applicant notes the authorities’ comments on Article 49(5) (traffic regulation) of the draft Development Consent Order and will consider whether drafting amendments are appropriate and necessary for inclusion in the revised draft Development Consent Order that will be submitted at Deadline 3.
Schedule 3 (requirements) (paragraph 1 (interpretation)) – paragraph 1(1) defines “discharging authority” as “the body responsible for giving any consent, agreement or approval required by a requirement included in this Order ...”. The definition is circular and unhelpful. Requirement 4 (construction management plans) provides for the involvement of the “other discharging authority” in certain activities; however, it is not clear who that authority is. Requirements are the DCO equivalent of planning conditions³⁷ and one of the six tests for conditions is precision³⁸. SCC consider the inclusion of “discharging authority” in requirement 4 creates imprecision and requests that the applicant recasts requirement 4 so that the body they want to be involved in requirement 4 is named. A similar drafting approach has been followed in the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024 (SI 2024/958) and that drafting has already caused confusion post-consent. SCC is keen to avoid any confusion in respect of this Order.	The Applicant responded to this representation in its response to SCC’s relevant representations in the following terms: The definition of ‘discharging authority’ included in Schedule 3 to the 3.1 Draft Development Consent Order [APP-056] (draft DCO) is deliberately drafted so as not to name specific authorities or bodies, noting the different geographies and authorities involved in the Project. The adopted approach is well-precedented by other DCOs. However, National Grid recognises that certainty is required by all parties over which bodies are defined as a discharging authority. National Grid will therefore seek to work with local authorities to consider further how responsibility for discharge of requirements between different bodies can be clarified. National Grid will also review the definitions used in the draft DCO to check whether any amendments can be made to ensure any greater clarity. The Applicant will provide an update at Deadline 3.
Schedule 3 (requirements) (paragraph 1 (interpretation)) – paragraph 1(4) needs to be amended as follows –	The Applicant has updated the draft Development Consent Order to reflect the authorities’ requested amendment.

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“Where an approval or agreement is required under the terms of any requirement or a document referred to in a requirement, or any requirement specifies “unless otherwise approved” or “unless otherwise agreed” by the relevant highway authority or the relevant planning authority, such approval or agreement may only be given where it has been demonstrated to the satisfaction of the relevant highway authority or the relevant planning authority that the subject matter of the approval or agreement sought will not give rise to any materially new or materially different environmental effects from those identified in the Environmental Statement”. This amendment is consistent with the drafting of the equivalent paragraph of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958).	
Schedule 3 (requirements) (requirement 3(2) and (3) (stages of authorised development)) – provides for notice of the commencement and completion of each stage to be given to the relevant planning authority within 28 days of the event occurring. SCC does not understand why it should take a month for this information to be provided and considers it should be provided in less time. For example, 14 days is the period stated in the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024 (SI 2024/958).	The Applicant has updated the draft Development Consent Order to replace the 28 day period with 14 days to mirror the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024.
Schedule 3 (requirements) (requirement 5(2) (archaeology)) – the development is expected to be delivered in stages, and each stage may involve multiple phases of archaeological work including evaluation and mitigation. Accordingly, Requirement 5(2) should be amended to refer to “detailed written schemes of investigation” (DWSI) (plural, rather than singular) to reflect that more than one DWSI will be produced for this scheme. Using the plural recognises that each stage may require multiple DWSIs and ensures clarity for the applicant and discharging authority, and secures the appropriate level of archaeological	The Applicant has updated the draft Development Consent Order accordingly.

Suffolk County Council and Babergh & Mid-Suffolk Statement	Applicant's Response
investigation, recording, and mitigation for all parts of the authorised development.	
Schedule 3 (requirements) (requirement 5(3) (archaeology) – paragraph (3) provides for a single DWSI, however, as discussed above, each stage is likely to have multiple DWSIs produced to deliver the appropriate level of archaeological investigation. SCCAS would therefore recommend this is reflected in paragraph 3 as follows – “(3) Each The detailed written scheme of investigation...”	The Applicant has updated the draft Development Consent Order accordingly.
Schedule 3 (requirements) (requirement 5(4) (archaeology) – the introductory words “For the avoidance of doubt” are unnecessary and should be omitted.	The Applicant has updated the draft Development Consent Order accordingly.
Schedule 3 (requirements) (requirement 5(3) (archaeology) – recommended further provisions – there must also be provision to secure full post-excavation analysis, timely publication, and deposit of complete physical and digital archives, with funding in place to deliver these stages. In the light of this, SCCAS recommend the inclusion of the following provisions in requirement 5 – <u>“5(5) No later than two years after the completion of the construction phase of work, an Updated Project Design must be submitted to and approved by the Local Planning Authority. The Updated Project Design must be in general accordance with the approved Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation, and relevant Detailed Written Schemes of Investigation, and set out scope for full post-excavation analysis, publication, and address the site-specific research agendas. Post-excavation analysis and publication must be carried out in accordance with the approved Updated Project Design.</u> <u>5(6) The full archaeological archive, both physical and digital, must be deposited to the relevant archaeological archive</u>	The further archaeology provisions proposed to Requirement 5 are considered and addressed earlier in this section (Development Consent Order, Requirements and Management Plans) of this document, and so we do not comment further here.

repository, for that County, in accordance with the approved archaeological Updated Project Design.

This drafting is based on requirement 3(6) (archaeology and peat) of the Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853) and so is a regime which the Secretary of State has already considered appropriate for Suffolk. SCCAS consider the regime should apply to the instant project also. For completeness, requirement 3(6) of the Sizewell Order states –

“Unless otherwise agreed with Suffolk County Council

- a. No later than two years following the completion of the fieldwork specified in each site-specific written scheme of investigation, a site-specific post excavation assessment for that site must be completed in accordance with the Overarching Written Scheme of Investigation and submitted to Suffolk County Council for approval.
- b. No later than one year following approval of the final site-specific post excavation assessment, an archaeological updated project design for all sites, must be submitted to Suffolk County Council for approval. The archaeological updated project design must be produced in general accordance with the Overarching Archaeological Written Scheme of Investigation, include details of the scope of post-excavation analysis and publication and have regards to the site-specific research agendas set out in the site-specific written schemes of investigation.
- c. Post-excavation analysis and publication must be carried out in accordance with the approved archaeological updated project design.
- d. The full archaeological archive must be submitted to the Suffolk County Council Archaeological Service (Archives) in accordance with the archaeological updated project design”.

Schedule 3 (requirements) (requirement 5(2) (archaeology)) – this provision names “the relevant planning authority” as the discharging

The Applicant has updated the draft Development Consent Order to refer to the “relevant discharging authority”, noting that the latter is

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authority. In Suffolk, SCC should be the discharging authority because archaeology is a county function. This approach is precedent. For instance, requirement 3 (project wide: archaeology and peat) of the Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853) names SCC as the approving authority for archaeological matters.	already separately defined in Paragraph 1(1) of Schedule 3 to the 3.1 Draft Development Consent Order [APP-056].
70. Schedule 4 (discharge of requirements) (paragraph 1, timescales) – the timescales in Schedule 4 are too short and should be changed so that they are, at the very least, no shorter than those set out in <i>Advice Note Fifteen: drafting Development Consent Orders</i>. The EM [APP-057] justifies the shorter timescales as follows – “Whilst it is acknowledged that the time limits included in Schedule 4 (in relation to the determination of applications made pursuant to the Requirements and any requests made by the relevant discharging authority for further information) do differ from those recommended in Advice Note 15, National Grid considers that shorter time limits are necessary and proportionate in light of the immediate and pressing national need which the project is intended to address. There is precedent for these time frames in the recently made National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024”. (paragraph 4.4.2). 71. This argument is unconvincing. The 28-day decision-making period in paragraph 1(1) of Schedule 4 (compared to the 42-day period in paragraph 1(2) of Appendix 1 to <i>Advice Note Fifteen</i>) is unlikely to affect “the immediate and pressing national need which the project is intended to address”. It will be noted that a longer period than 35 days has been considered appropriate for other Suffolk-based energy NSIPs, which are Critical National Priority Infrastructure: (i) Sizewell C (Nuclear Generating Station) Order 2022(SI 2022/853) – 6 weeks (i.e. 42 days), and 8 weeks (i.e. 56 days) if there are named consultees: paragraph 1 of Schedule 24 (ii) East Anglia ONE North Offshore Wind Farm Order 2022 (SI 2022/432) – 56 days where no further information is requested and	The Applicant responded to this representation in its response to SCC’s relevant representations in the following terms: National Grid acknowledges these comments. However, National Grid considers that the time limits included within Schedule 4 to 3.1 Draft Development Consent Order [APP-056] are necessary and proportionate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government’s Clean Power target of 2030, is not unnecessarily delayed by means outside the control of the Applicant. Furthermore, Annex 2 of the National Energy System Operator’s (NESO) Clean Power 2030 Report published in November 2030 identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031. It is noted that there is already scope within Paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) to extend the 28-day period for the discharge of Requirements by agreement in writing between the undertaker and the relevant authority. In any case, National Grid will nevertheless negotiate Planning Performance Agreements as necessary and at the appropriate time, to ensure SCC, and other relevant host authorities, are able to respond on programme.

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42 days where further information is requested: paragraph 1 of Schedule 16 and (iii) East Anglia TWO Offshore Wind Farm Order 2022 (SI 2022/433) – 56 days where no further information is requested and 42 days where further information is requested: paragraph 1 of Schedule 16. Furthermore, the time for determining applications for the discharge of requirements under the Sunnica Energy Farm Order 2024 (SI 2024/802) is 56 days (paragraph 2 of Schedule 13). 72. While SCC will ensure that any request for approval will be dealt with as quickly as possible, it will be remembered that SCC will be receiving a considerable number of requests for approval across several nationally significant infrastructure projects. A 42-day decision-making period would be challenging in this context; the reduction of the timeframe to 28 days is unrealistic and potentially detrimental to the effective consideration of requests. Owing to these circumstances, the Councils consider a 56-day decision-making period would be reasonable. Paragraph 4.4.3 of the EM [APP-057] says this schedule is “identical to the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024”. It is not. The equivalent period in the Bramford Order is 35 days. SCC’s experience of determining applications for the discharge of requirements for that Order have shown that 35 days is insufficient. More time, not less, is required here. For example, in SCC’s experience in discharging requirements under the Bramford DCO, the provision of 35 days, as opposed to 56 days, has been counterproductive to the prompt delivery of energy infrastructure projects. 56 days allows the discharging authority to ensure that consultees, including statutory consultees, respond within the decision period with enough time for any objections to be resolved with the applicant. When the decision period is only 35 days, SCC has found that there is insufficient time for objections to be resolved resulting in extensions of time being agreed or applications being rejected. In either case, the applicant’s delivery programme is	The Applicant notes the error flagged in the authorities’ Local Impact Report at paragraph 14.73 and has updated the draft Explanatory Memorandum to correct this. However, the Applicant’s position as to the necessity of the 28 day decision period remains unchanged from that set out above.

compromised due to delay. This has resulted in the Bramford applicant rushing to make amendments which sometimes do not address the issues raised, resulting in further amendments needed to allow the requirement to be discharged. This sometimes leads to the decision period being extended beyond 56 days. SCC has not encountered this problem where it has 56 days to decide applications. Therefore, SCC considers that a decision period of 56 days to be more conducive than 35 days to the delivery of critical energy infrastructure.

Schedule 4 (discharge of requirements) (paragraph 2, further information) – SCC considers the provisions for requesting further information to be insufficient. As drafted, the discharging authority is permitted only 7 days to request further information otherwise it is considered to have sufficient information. This is an unreasonable burden to place on the discharging authority. Deciding whether further information is needed requires an extensive review of the submitted documents by officers of various technical disciplines which is unfeasible to complete in 7 days. The Order makes provision of 35 days to decide applications, the bulk of which time is spent reviewing the submitted documents to reach a conclusion on whether they fulfil the obligations set out in the requirement. It is only once the documents have been thoroughly reviewed that it can be decided whether an application includes sufficient information for the requirement to be discharged. There is no limit to how many applications can be submitted to a discharging authority at once meaning it is possible for the discharging authority to be expected to review multiple applications amounting to many hundreds of pages of technical detail in just 7 days.

Therefore, SCC considers a more reasonable time limit of 21 days would give the discharging authority adequate time to decide whether an application contains sufficient information. If the Applicant

Given the Project's status as a project of critical national importance, the Applicant considers five days for the relevant discharging authority to request additional information to be proportionate and appropriate. It aligns with the timeframe in the draft National Grid (Sea Link) Order. Paragraph 2(4) of Schedule 4 to the **3.1 Draft Development Consent Order [APP-056]** allows the relevant authority to seek the Applicant's consent to request further information after the five day period if necessary. The Applicant has been, and continues to be, committed to collaborative working with the relevant authorities.

maintains that 7 days is reasonable, then this position should be justified in the **EM [APP-057]** which currently lacks such a rationale.

Schedule 4 (discharge of requirements) (paragraph 3, fees) – the first point to make is that while SCC will be required to deal with applications for consent under articles and under requirements, however, by paragraph 3(1) of Schedule 4, a fee is only payable in respect of requirements. SCC considers that fees should also be paid for dealing with applications under articles and requirements. SCC's approach here is consistent with the standard drafting for a provision dealing with procedure for the discharge of approvals, as set out in Appendix 1 to PINS Advice Note 15, which concerns drafting DCOs. There is no justification in the EM [APP-057] for departing from this advice.

The second point to make is that the proposed fee is unreasonably low. Paragraph 3(1) says a fee must be paid as follows –

“(a) such fee as may be prescribed (under sections 303 and 333(2A) of the 1990 Act for the discharge of conditions attached to a planning permission); or

(b) a fee of £145 per request unless a bespoke arrangement has been agreed between the applicant and discharging authority and legally secured”.

Regarding (a), this is an application for a nationally significant infrastructure project under the Planning Act 2008, not for (say) a garage extension under the TCPA 1990. The fee should reflect the work involved.

Turning to (b), £145 per application is lamentably and unreasonably low. If we assume an hourly rate of £100 for an officer to deal with this work, the fee under (b) would mean the officer would have to deal with any discharge application within around 90 minutes before dealing with the application started to cost the local authority money. It is unlikely that any application will be capable of determination within that period. While the Councils cannot make a profit for this

The Applicant does not consider it appropriate or proportionate to require payment of the application fee for any consent sought under the draft Development Consent Order, some of which will be very minor in nature. The Applicant has been, and is committed to, collaborative working and proposes to enter into post-consent planning performance agreements that are intended to work alongside the provisions of the draft Development Consent Order to facilitate this. The Applicant would reimburse the host authorities for reasonably and properly incurred costs in progressing the agreed workstreams, as it has done for the Application Stage planning performance agreements.

In relation to paragraph 3(1), the Applicant has amended the draft Development Consent Order to refer to the current national fee schedule applicable to the discharge of planning conditions. The drafting proposed by the Applicant in this paragraph has precedent in a number of recent development consent orders, including the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 and the National Grid (Bramford to Twinstead Reinforcement) Order 2024.

In relation to paragraph 3(2) the Applicant considers it reasonable to request a refund of the application fee in the instances provided for, not least where a planning performance agreement is in place. This provision has precedent in the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.

The Applicant proposes to enter into post-consent Planning Performance Agreements, the contents of which will be discussed and agreed with the relevant stakeholders in due course.

work, it is reasonable for it to seek the full recovery of the actual costs incurred. The applicant's approach here is wholly unfair.

This is not only about fairness but also about the way in which the Order is drafted. For example, by paragraph 1 of Schedule 4, the Councils will have 28 days to make its decision on any application and if no decision is made within that period, consent will be deemed to have been granted. The same applies in respect of consents sought under articles. Dealing with any application for consent under this Order will therefore be a matter of high priority for SCC, diverting officer resource from other matters. The inclusion of the deeming provision and its effects on SCC resourcing is another reason why SCC considers its full costs for this work should be covered by the applicant.

Rather than the regime currently proposed in the Order, SCC considers it would be preferable if the applicant and SCC entered into a planning performance agreement ("PPA") for the full recovery of SCC's costs in discharging any application under the Order. Paragraph 3(1) should be recast to provide that no application can be made until an appropriate PPA is in place.

Moreover, paragraph 3(2) – which provides for the refund of fees in certain circumstances – is unreasonable and should be deleted. For example, paragraph 3(2)(a) provides for repayment in the event of "the application being rejected as invalidly made". To reject an application, the discharging authority will have had to consider it and the time taken to do so should be paid by the applicant and not the authority.

Schedule 16 (protective provisions) – Part 4 of Schedule 16 includes provisions for the protection of highway authorities. These have not been agreed by SCC and there have been no discussions with SCC about them. SCC would welcome discussions as a matter of urgency, noting the contents of the MHCLG and DLUHC guidance Planning Act 2008: Content of a Development Consent Order

The Applicant shared the draft protective provisions in favour of the local highway authorities on 22 July 2025 with Suffolk County Council (as well as the other Highways Authorities) requesting any comments. This version of the Protective Provisions was then included in the draft Development Consent Order at submission, pending negotiation with the Highways Authorities. Whilst National

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required for Nationally Significant Infrastructure Projects (30 April 2024) which states: “Applicants should expect to agree the form of protective provisions with the relevant parties for inclusion in the draft DCO <u>prior to submitting the application for development consent</u>...” [Emphases added].	Grid has not yet received any response to this from Suffolk County Council, it has received some initial comments from Essex County Council and it is noted from correspondence with Norfolk County Council that the local highways authorities are jointly appointing legal advisors to advise in relation to the Protective Provisions (or a joint highways framework Agreement). Confirmation of the legal advisors acting is awaited. It is the Applicants understanding that the Highways Authorities are seeking a joint highways framework agreement in lieu of protective provisions, which the Applicant will seek to negotiate with the Highways Authorities provided it can be concluded before the end of the Examination. A draft of this agreement was shared on the week commencing 23 February 2026 (along with updated Protective Provisions to reflect Essex County Council’s comments) to all the Highways Authorities and we await comments.

South Norfolk District Council

Table 3.26 South Norfolk District Council – Applicant’s Response to Local Authority comments on the draft DCO

South Norfolk District Council’s Statement	Applicant’s Response
3.1.14 The inclusion of a provision granting immunity from prosecution requires careful consideration. If such a provision were to be included, it should be strictly limited to circumstances where the undertaker has demonstrably taken all reasonable measures to prevent noise and vibration nuisance. 3.1.15 The Council’s position remains that immunity from prosecution should not be incorporated within the DCO. The existing legislative framework under COPA already affords a statutory defence where National Grid can demonstrate the use of Best Practicable Means (BPM). Where works are undertaken pursuant to a Section 61 consent, noise levels and durations can be conditioned and any breach of those conditions remain enforceable. In such cases, BPM again constitutes a valid defence against prosecution.	The Applicant responded to this representation in its response to South Norfolk District Council’s relevant representations and does not repeat that response here, but would further note that this article is based on article 7 of the general model provisions, with the removal of references to section 65 of the Control of Pollution Act 1974, following its repeal, and mirrors article 45 of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024. This provision is appropriate for inclusion to ensure that nuisance claims are considered in the context that the effects of the Project, as one of Critical National Priority that is needed to facilitate Clean Power 2030, if the Order is made, will have been found to be acceptable on the terms of the Order and its Requirements.
9.2.2 To ensure continuity, resilience and futureproofing, the Council advises that the DCO Requirements should clearly specify the Local Planning Authority (LPA) as the discharging authority for all conditions.	To the extent that a formal discharge of a Requirement is necessary, the Applicant has drafted the 3.1 Draft Development Consent Order in such a way as to ensure the submission for approval is directed to the relevant discharging authority.
9.2.3 In addition, certain Requirements, particularly those relating to heritage, archaeology or environmental matters, should explicitly identify relevant statutory consultees (such as Historic England or the Historic Environment Service) to ensure that specialist advice is properly integrated into the discharge process.	The Applicant notes the Council’s position on specifying relevant consultees for each Requirement and, as part of our ongoing engagement with these parties, we will review if others wish to be listed as consultees.
9.4.1 The Draft DCO does not provide a definition of what constitutes a “very minor amendment”, nor does it set out the circumstances in which such changes may be approved without triggering a full resubmission under the Requirement discharge process.	At present, the expression ‘very minor amendment’ is not used in 3.1 Draft Development Consent Order [APP-056] (draft DCO). The Applicant will give regard to the point raised in the second sentence as it prepares the next revision of the draft DCO for submission at Deadline 3. The Applicant agrees that care needs to be taken that the

South Norfolk District Council's Statement	Applicant's Response
9.4.2 Under the current drafting by National Grid, even small changes trigger a formal discharge process, which could place unnecessary administrative burdens on both the developer and the Local Planning Authorities. Clarity on this matter is essential to guarantee an efficient and proportionate post-consent process.	burden on authorities does not become disproportionate or unnecessary.

Tendring District Council

Table 3.27 Tendring District Council – Applicant's Response to Local Authority comments on the draft DCO

Tendring District Council's Statement	Applicant's Response
TDC supports and adopts the comments and recommendations made by ECC on the Draft Development Consent Order, as set out in their Local Impact Report. As these matters are fully addressed by ECC, TDC does not repeat them here but respectfully requests that the ExA consider ECC's submissions and the reasons provided therein, as they are directly relevant to the district of Tendring.	We note the Council is aligned with the representations made on the draft Development Consent Order in Essex County Council's Local Impact Report. The Applicant has responded to Essex County Council's Local Impact Report and does not repeat its responses on draft Development Consent Order matters here.

Thurrock Council

Table 3.28 Thurrock Council – Applicant’s Response to Local Authority comments on the draft DCO

Thurrock Council’s Statement	Applicant’s Response
<u>Article 2 (Interpretation) – definition of “pre-commencement operations”</u> The current definition of "pre-commencement operations" in Article 2(1) (Interpretation) of the draft DCO [APP-056] includes investigations and surveys, which the Council understands would apply to both intrusive and non-intrusive investigations and surveys. Under Article 3(1) (Stages of authorised development) of the draft DCO, unless otherwise agreed with the relevant planning authority, written notice of the anticipated programme for these operations must be given to the relevant planning authority. The Council is concerned that the current provisions of the draft DCO permits the carrying out of investigations and surveys, regardless of whether these are intrusive or non-intrusive, without agreement of the Council. The Council requires that, at a minimum, a Licence Agreement and details of the investigation(s)/survey(s) must be agreed and in place prior to the carrying out of those pre-commencement operations. The definition of "pre-commencement operations" also includes "demolition of existing buildings". The Council requires that its prior approval is sought and granted before demolition of any building(s) where the building(s) lies within an area where it is the competent authority.	The Applicant has carefully considered the definition of ‘pre-commencement operations’ to ensure it is suitable for the specific circumstances of the Norwich to Tilbury Project. As noted in the Applicant’s response to Suffolk County Council’s relevant representation, all pre-commencement operations must be carried out in accordance with the outline construction management plans, as well as the outline archaeological mitigation strategy and outline written scheme of investigation. Requirement 3(1) requires the Applicant to give the relevant planning authority written notice of the anticipated programme for the carrying out of pre-commencement operations no less than seven days before those pre-commencement operations are first carried out. National Grid considers that the outline management plans provide effective control over these excluded works and operations, noting that the approach mirrors that adopted on other recent projects, including the Bramford to Twinstead project. If made, the draft Development Consent Order includes authority for the undertaker to survey and investigate the land (<i>Article 22 Authority to survey and investigate the land</i>). Prior to the coming into force of the development consent order, the undertaker would need to obtain the necessary landowner consents to enter the land for the purpose of the surveys. National Grid has not currently identified any buildings that would need to be demolished. If demolition was to be required, it would be due to unforeseen circumstances and, given the Project’s status as one of Critical National Priority, the Applicant does not consider it proportionate to obtain prior approval.
<u>Article 5 – Limits of deviation</u>	The limits of deviation described in Article 5 and shown on the Works Plans and Tables of Parameters have been assessed for the purposes

Thurrock Council's Statement	Applicant's Response
The current drafting of Article 5(1) permits the undertaker to deviate from controls and restrictions that would otherwise apply, for example in circumstances such as those set out in Article 5(1)(b) with regard to pylon works. The carrying out of works within the limits of deviation does not require the undertaker to seek prior approval from the relevant planning authority. As such, the Council is concerned that the Outline CoCP [APP-300] does not contain any specific commitments that apply to works in sensitive areas such as listed building or conservation areas. The Council requests that the Applicant clarifies its approach to the carrying out of works in sensitive areas such as listed building or conservation areas and includes a commitment within the Outline CoCP and/or by another mechanism secured within the draft DCO that would safeguard these areas.	of the Environmental Statement. This, together with the Project's status as one of Critical National Priority and the need to energise the Project by 2030, means that it is disproportionate to include controls seeking prior approval for movement within the limits of deviation from the planning authorities within the 3.1 Draft Development Consent Order [APP-056]. Where the assessment identified any particularly sensitive heritage receptors, additional mitigations was identified and is secured in the 7.2 Outline Code of Construction Practice [Revision B].
<u>Article 11 – Street works</u> Article 11 grants the undertaker wide-ranging powers, including those which can be carried out without the consent of the street authority under Article 11(1). The Council notes that the draft DCO [APP-056] contains Protective Provisions for the protection of the highway authorities (at Part 4 of Schedule 16). These Protective Provisions must contain adequate protections that ensure the Council as Local Highway Authority is not subject to detriment as a result of the carrying out of the authorised development. The Council may make further submissions on the content of these Protective Provisions.	The Applicant shared the draft protective provisions in favour of the Highways Authorities on 22 July 2025 with Thurrock Council and requested any comments. This version of the Protective Provisions was then included in the dDCO at submission, pending negotiation with the Highways Authorities. Whilst the Applicant has not yet received any response to this from Thurrock Council, it has received some initial comments from Essex County Council and it is noted from correspondence with Norfolk County Council that the Highways Authorities are jointly appointing legal advisors to advise in relation to the Protective Provisions (or a joint highways framework Agreement). Confirmation of the legal advisors acting is awaited. It is the Applicant's understanding that the Highways Authorities are seeking a joint highways framework agreement in lieu of protective provisions, which the Applicant will seek to negotiate with the Highways Authorities provided it can be concluded before the end of the Examination. A draft of this agreement was shared on the week commencing 23 February 2026 (along with updated Protective

Thurrock Council's Statement	Applicant's Response
<u>Article 11(3) – Street works</u> The draft DCO [APP-056] provides at Article 11(3) that: "If a street authority that receives an application for consent under paragraph (2) fails to notify the undertaker of its decision within 28 days (or such other period agreed by the street authority and the undertaker) beginning with the date on which the application was received, that authority will be deemed to have granted consent." Thurrock Council raises concern regarding the proposed deemed consent mechanism whereby, if the street authority fails to notify the undertaker of its decision within 28 days, consent is automatically granted. While the Council recognises the need for procedural efficiency in delivering the Project, the proposed drafting presents the following concerns: 1. Insufficient Determination Period A 28-day period may be inadequate where applications involve: • Technical highway design review • Road safety audits • Drainage and structural considerations • Traffic management impacts • Consultation with internal departments or third parties • Technical Assessment of CAT0, 1 or 2 structures is required Highway-related submissions frequently require detailed engineering assessment. The automatic grant of consent due solely to administrative timescales could prejudice highway safety and network integrity. 2. Risk to Statutory Duties As highway authority, the Council has statutory duties under the Highways Act 1980 to ensure the safe and efficient operation of the	Provisions to reflect Essex County Council's comments) to all the Highways Authorities and we await comments. The Applicant has responded on the deemed approvals process and the proposed 28-day timeframe in its responses to relevant representations and does not repeat that response here. In practical terms, the Applicant would anticipate working closely with Thurrock Council and other relevant authorities to provide advance notice, where practicable, of any requests for approval to which a deeming provision would apply under the draft DCO. Article 11(3) (street works) of the draft Development Consent Order allows the parties to agree "such other period" for the deemed approval process as may be necessary and appropriate to account for circumstances where the application is incomplete. The Applicant anticipates working closely with Thurrock Council to ensure that both parties are aligned with what information would be needed to obtain the necessary consents and to avoid any unnecessary delays. National Grid remains in ongoing dialogue with Thurrock Council to ensure that the impacts of the Project are appropriately managed and mitigated.

Thurrock Council's Statement	Applicant's Response
highway network. The deemed consent provision could undermine the Council's ability to properly discharge those duties if consent is granted by default rather than through technical approval. 3. Lack of Safeguard for Incomplete Submission The drafting does not expressly provide that the 28-day period commences only upon receipt of a "complete" application. Without such clarification, there is potential for the undertaker to submit insufficient information, thereby triggering the deemed consent mechanism before proper assessment can occur. The Council therefore requests that: • The determination period be extended to a minimum of 42 days; and/or • The deemed consent provision be removed in respect of highway authority approvals; and/or • The period should only commence once the authority confirms in writing that a complete submission has been received; and • Deemed consent should not apply where further information has reasonably been requested within the determination period. • Where Technical Assessment of CAT0, 1 or 2 structures is required, the Council will require an extension of this period by up to 3 months	
<u>Article 14 – Power to alter layout, etc. of streets</u> The Council notes that the powers contained in Article 14 are wide-ranging and under Article 14(1) may be carried out with[out] the consent of the street authority. This includes the power to permanently or temporarily alter the layout of streets where the Council is the relevant street authority. Article 14(2) also confers wide-ranging powers to the undertaker regarding streets but is subject to Article 14(4), meaning that paragraph (2) may not be exercised without the consent of the street authority (such consent not to be unreasonably withheld or delayed).	The powers contained in Article 14(1) which do not require the consent of the street authority relate to those streets specified in column (1) of Parts 1 or 2 of Schedule 6 (streets subject to alteration of layout) and in the manner described in column (2) of those parts of Schedule 6. The powers conferred by Article 14(2)(a) can be exercised on streets not listed in Schedule 6 but only with the consent of the street authority. The Applicant notes the Council's position on the imposition of requirements and remains in ongoing dialogue with Thurrock Council

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Where the Council is the relevant street authority, it may set requirements for its consent to be granted, such as a safety audit where powers under Article 14(2)(a) are proposed to be exercised by the undertaker. Any application for consent would be considered against all the relevant issues, such as the route and traffic usage on that route. The Council may also grant its consent subject to certain conditions such as liaison with the Council's Highways Maintenance team, which may have specific requirements for surfacing for roads and their traffic levels. The Council expects that powers exercised under Article 14(2) would only be done so in consultation with the relevant highway authority.	to ensure that the impacts of the Project are appropriately managed and mitigated.
<u>Article 16 – Temporary closure of streets and public rights of way</u> Some of the powers that may be exercised by the undertaker under Article 16 do not require prior approval by the relevant highway authority. For example, Article 16(1) provides that the undertaker may temporarily close, alter or divert any street or public right of way shown on the access, rights of way and public rights of navigation plans or within the Order limits and may for any reasonable time divert the traffic from the street or public right of way and subject to paragraph (3), prevent all persons from passing along the street or public right of way. The Council is concerned that where prior approval by the relevant highway authority is not required, service users of highways may not be adequately protected and suitable alternative provisions may not be provided by the undertaker. The Applicant must ensure that suitable protections are included in the Protective Provisions of the draft DCO or a separate side agreement be entered with the Council as highways authority.	As noted in the Applicant's response to relevant representations, the Applicant has incorporated draft protective provisions into 3.1 Draft Development Consent Order [APP-056] ('the draft DCO') and has sought engagement with the relevant highway authorities on these provisions. The Applicant will continue to engage with the authority throughout the Examination process.
<u>Article 17 – Access to works</u> The Council notes that Article 17(1)(a) permits the undertaker to form and lay out new means of access, or improve existing means of access, at locations specified in Schedule 9. The Council will need to	As noted in the Applicant's response to relevant representations, the Applicant has incorporated draft protective provisions into 3.1 Draft Development Consent Order [APP-056] ('the draft DCO') and has sought engagement with the relevant highway authorities on these

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ensure that all such accesses within its administrative area are acceptable in highway safety, traffic management, and structural terms. The Council therefore expects that detailed design approval, including construction methodology and reinstatement details, will be secured through appropriate protective provisions or requirements. In relation to Article 17(1)(b), the Council has particular concern regarding: 1. Breadth of Undertaker Discretion The power to form or improve “such other means of access... as the undertaker reasonably requires” within the Order limits is broad. While subject to street authority consent, the drafting gives significant flexibility to the undertaker without clearly defined assessment criteria. The Council considers that clearer parameters should apply to: • The scale and type of access permitted; • Traffic generation and construction vehicle routing implications; • Impacts on the local highway network, including sensitive rural lanes and residential roads. 2. Deemed Consent Mechanism (Article 17(2)) The deemed consent provision presents a material risk to the Council in its capacity as highway authority A 28-day determination period may be insufficient where: • The access has safety implications; • Technical review is required (e.g. swept path analysis, Stage 1/2 Road Safety Audit, drainage assessment); • Internal consultation or committee reporting is necessary. The Council is concerned that failure to respond within 28 days results automatically in deemed consent, regardless of complexity. This could undermine proper highway assessment and public safety considerations. The Council therefore recommends that:	provisions. The Applicant will continue to engage with the authority throughout the Examination process and therefore at this stage it does not consider any amendment to this article of the draft DCO to be necessary. The Applicant responds to Thurrock's comments on deemed consent provisions in relation to Article 11 above and does not repeat its response here.

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• The determination period be extended to a minimum of up to 42 days and/or • Deemed consent should not apply in relation to highway authority functions and/or • Deemed consent should only apply where sufficient supporting technical information has been provided and agreed as complete.	
<u>Article 27(5)(b) – Temporary use of land by National Grid</u> This Article provides that National Grid is not required to restore the land on which any works or mitigation works have been carried out under paragraph (1)(d), which applies to. The Council requires a commitment from National Grid that it would restore such land as this land should not be subject to detriment as a result of the implementation of the DCO.	Article 27(5) (temporary use of land by National Grid) requires, as an overarching point of principle, NGET to remove all temporary works and restore the land to the reasonable satisfaction of the landowner. The primary purpose of the drafting of Article 27(5)(b) is to ensure that any mitigation works put in place as part of the temporary works do not need to be removed, as to do so would be counterintuitive.
<u>Article 49 – Traffic regulation</u> Article 49 grants broad powers to the undertaker that may have serious implications for the highways network, including the prohibition of use of roads by through traffic. The Council is concerned that such powers may be used by the undertaker unilaterally and without proper liaison with the relevant highway authority. The draft DCO should be updated so that Article 49 powers are available to the undertaker in consultation with the relevant highway authority. This will ensure that sufficient controls are in place to ensure the highway network is not subject to unnecessary detriment as a result of the implantation of the DCO.	The Applicant's justification for the approach taken in respect of Article 49 is set out in Paragraph 3.53 of the 3.2 Explanatory Memorandum. As is noted in the Explanatory Memorandum, there is precedent for this approach in the National Grid (Bramford to Twinstead Reinforcement Project) Order 2024 (see Article 46). There is further precedent in the National Grid (Richborough Connection Project) Development Consent Order 2017 (see Article 39) and indeed in the Sizewell C (Nuclear Generating Station) Order 2022 (see Article 24).
<u>Article 56(6) – Safeguarding</u> Article 56(6) provides that the requirement to consult under this article is a local land charge. The Council requests that the Applicant clarifies why this provision is necessary when by virtue of section 134 of the Planning Act 2008, the DCO would be registered as a local land charge. The Council is mindful that Article 56 may impose an	As explained in the 3.2 Explanatory Memorandum in paragraph 3.60.8, by making the requirement a local land charge the Applicant is seeking to enable local planning authorities to comply with this provision without an undue administrative burden and ensure the provision's effectiveness. Further, by registering the provision as a local land charge specifically rather than the DCO generally, this will ensure the safeguarding provision itself will become readily apparent

Thurrock Council's Statement	Applicant's Response
additional and unnecessary administrative burden on the relevant local planning authority.	to all concerned in the early stages of handling an application for planning permission.
<u>Article 59(2)(a) – Amendment of local legislation</u> This Article provides that a power conferred by the DCO may be exercised without regard to a specified enactment, or any other statutory provision of local application, that requires or permits a specified road, path, passage, bridge, parapet, fence or other place or structure to be kept open or maintained generally or in a specified manner. The Council does not consider that Article 59(4) provides sufficient protection to the Council's role as local highways authority. Article 59(4) must be exercised in consultation with the relevant highway authority.	The purpose of Article 59 is to ensure that the Applicant does not inadvertently breach local legislation, byelaws or other local enactments, some of which may be historic and not readily available in publicly accessible resources, that might interfere with the delivery of the Project. Notwithstanding the provisions of Article 59, the Applicant must comply with the protective provisions that are included in the draft Development Consent Order for the protection of the highways authorities. As such, the Applicant does not consider it necessary to amend the drafting of Article 59, which has precedent in the National Grid (Bramford to Twinstead Reinforcement) Order 2024.
<u>Requirement 3 – Stages of an authorised development</u> The Council has raised concerns regarding the definition of “pre-commencement operations” in Article 2(1) of the draft DCO. The definition (interpretation) of “pre-commencement operations” includes investigations and surveys. The Council understands this to encompass both intrusive and non-intrusive activities. The Council considers it inappropriate that such works may proceed without prior approval or formal agreement from the Council. Notification alone does not provide the Council with sufficient control to ensure that works are properly scoped, managed, and insured, nor does it secure appropriate reinstatement obligations. The Council's position remains that • A Licence Agreement must be in place prior to entry onto Council-owned land; • Full details of the proposed investigations/surveys must be submitted and approved in writing before works commence; • Appropriate method statements, risk assessments and reinstatement proposals must be agreed in advance.	As noted in the Applicant's response to Suffolk County Council's relevant representation, all pre-commencement operations must be carried out in accordance with the outline construction management plans, as well as the outline archaeological mitigation strategy and outline written scheme of investigation. Requirement 3(1) requires the Applicant to give the relevant planning authority written notice of the anticipated programme for the carrying out of pre-commencement operations no less than seven days before those pre-commencement operations are first carried out. National Grid considers that the outline management plans provide effective control over these excluded works and operations, noting that the approach mirrors that adopted on other recent projects, including the Bramford to Twinstead project. The Applicant notes that the obligation is to provide a notification only and, therefore, there is no requirement for the relevant authority to take any further action or other positive step(s) within those seven days. As a consequence, it is unclear what further utility would be served by increasing that period.

Thurrock Council's Statement	Applicant's Response
The Council also notes that seven days' notice is insufficient for meaningful review and there is no express mechanism preventing works from proceeding where concerns are raised within the notice period. The Council request that the seven-day notice period is extended or replaced with a prior approval mechanism. Also, that demolition is removed from the definition of pre-commencement operations unless expressly approved by the relevant planning authority.	
<u>Requirement 6 – Design and layout plans</u> The Council requests that the drafting of Requirement 6(1) is amended as follows: "(1) The authorised development must be carried out in general accordance with the levels shown on the design and layout plans (elevations) unless otherwise agreed in writing with the relevant planning authority."	The Applicant will consider the Council's proposed amendment in the revision of the draft Development Consent Order to be submitted at Deadline 3.
<u>Requirement 9 – Reinstatement planting plan</u> The Council has raised in its Local Impact Report that it is concerned with prolonged construction impacts on landscape receptors, PRoWs, visual amenity; coordination with the LTC mitigation planting; early delivery of planting to offset visual harm, loss of screening and amenity impacts etc. The Requirement as drafted does not guarantee early planting and also allows planting to be postponed until a potentially late operational trigger.	As noted in the Applicant's response to relevant representations, the drafting makes clear that the latest point at which the reinstatement planting works may be carried out is the first available planting season after the relevant part of the authorised development is brought into operational use. The Applicant does not consider it necessary to amend the wording of Requirement 9(4). The Applicant may find itself in a situation where it could carry out reinstatement planting in the current planting season, rather than waiting until the next planting season.
<u>Requirement 9(3) – Reinstatement planting plan</u> The Council considers that the requirement to be "in general accordance with the outline landscape and ecological management plan" is too uncertain and subjective. The Council requests the draft DCO be updated to remove reference to "general" to remove the ambiguity about how this Requirement will be adhered to.	The wording proposed has been selected to reflect the scale of the Project, the level of detailed design at the time, and to ensure sufficient flexibility to respond to such final design proposals as will be agreed with the relevant authority as prescribed in 3.1 Draft Development Consent Order [APP-056]. The proposed reinstatement plan will be submitted to the relevant planning authority for approval and the reinstatement works must then be carried out in accordance with the approved plan.

Thurrock Council's Statement	Applicant's Response
<u>Requirement 10 – Reinstatement schemes</u> The Council considers that 21 months is a prolonged period during which land may remain in a disturbed or substandard condition which may result in extended visual, environmental and amenity impacts. The Council considers that reinstatement should occur within 12 months or as soon as reasonably practicable following completion of construction in each area, rather than allowing a blanket 21-month period.	As noted in the Applicant's response to relevant representations, the 21-month period links back to the time period in Article 27 (Temporary use of land by National Grid) and Article 28 (Temporary use of land by UKPN) of 3.1 Draft Development Consent Order [APP-056], in which the undertaker is not permitted to remain in possession of the land without the consent of the owners after the end of a period of 21 months.
Proposed additional Requirements	The Applicant addresses these in 1.17 Requirements/Management Plans and does not consider these here further.
<u>Schedule 4(1)(1) – Discharge of Requirements</u> This part of Schedule 4 provides that a relevant authority must give notice to the undertaker of its decision on any application made by the undertaker for consent, agreement or approval required by a Requirement within 28 days. The Council requires that the time period matches the period that is contained in the final, agreed version of the Planning Performance Agreement between the Council and the Applicant.	The Planning Performance Agreements (PPA) currently in place are relevant to the pre-Application, Application and Examination phases. Post-consent PPAs would deal with matters following grant of development consent. The Applicant's position is that a 28-day decision-making timeframe is proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Clean Power Target of 2030, is not unnecessarily delayed by means outside the control of the Applicant. Annex 2 of the National Energy System Operator's (NESO) Clean Power 2030 Report published in November 2024 identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031.
<u>Schedule 4(2)(2) – Discharge of Requirements</u> The Council considers that the 5 day response period provided for the relevant authority is not appropriate and that it must be extended. "Within 5 days of receipt of the application" would include weekends, which means the Council would lose 2 days to review and respond to	Given the Project's status as a project of critical national priority, the Applicant considers five days for the relevant discharging authority to request additional information to be proportionate and appropriate. It aligns with the timeframe in the draft National Grid (Sea Link) Order. Paragraph 2(4) of Schedule 4 to the 3.1 Draft Development Consent Order [APP-056] allows the relevant authority to seek the Applicant's

Thurrock Council's Statement	Applicant's Response
an application by the undertaker. At a minimum the Council requests that the 5 day period is computed as business/working days.	consent to request further information after the five-day period if necessary. The Applicant has been, and continues to be, committed to collaborative working with the relevant authorities.
<u>Schedule 4(3) – Discharge of Requirements</u> The Council notes that the draft DCO provides for a fee of £145 per request, where an application is made to a relevant authority for any consent, agreement or approval required by a Requirement, payable unless a bespoke arrangement has been agreed between the applicant and discharging authority and legally secured. The Council requires that any fees payable in these circumstances are in line with national planning fees, or such fees agreed with the Applicant, to ensure the proper cost of processing these applications is charged.	The Applicant has amended the draft Development Consent Order to refer to the current national fee schedule applicable to the discharge of planning conditions.

3.19 Pre-Commencement Operations

Local Authority Positions

- 3.19.1 Four Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 3.29 Pre-Commencement Operations - Local Impact Report coverage

Local Authority	Paragraph(s) covering this topic
Norfolk County Council	N/A
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	13.203, 14.5 – 14.10
Essex County Council	5.2.4 – 5.2.8
Thurrock Council	Appendix A
South Norfolk District Council	N/A
Tendring District Council	N/A
Colchester City Council	N/A
Braintree District Council	16.2.1 – 16.2.4
Chelmsford City Council	N/A
Brentwood Borough Council	N/A

The Applicant's Position

Introduction

- 3.19.2 This section addresses matters related to pre-commencement operations as defined in Part 1 of 3.1 Draft Development Consent Order [APP-056] in Local Impact Reports submitted at Deadline 1 by Essex County Council, Thurrock Council, Braintree District Council and the combined LIR of Babergh, Mid Suffolk Council and Suffolk County Council.
- 3.19.3 The Applicant has previously responded to queries raised by Suffolk County Council in (page AB12 paragraph 68 and AB13 paragraph 73) and Braintree District Council (page E21, Paragraph 14.3) on this topic in 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] submitted at Deadline 1. This document does not repeat those responses. Instead, it addresses additional points raised for the first time in Local Impact Reports.
- 3.19.4 The definition of pre-commencement operations may appear extensive when read in isolation, however it is important that pre-commencement operations are understood in the context of the DCO as a whole.

- 3.19.5 All pre-commencement operations are subject to the following controls:
- **Outline Management Plans**
Works must accord with the Outline Management Plans (Requirement 4) and **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** (Requirement 5), unless otherwise agreed with the relevant planning authority (and Historic England where applicable).
 - **Protective Provisions**
Full compliance with Schedule 16 Protective Provisions (including for highway and utility authorities).
 - **Approvals Where Required**
Any measures within the outline plans that require agreement must be approved **before** the relevant activity is undertaken.
 - **Land Rights**
Confirmation that land has been acquired or possessed prior to works.
 - **Other Regulatory Regimes**
Activities remain subject to any other applicable consents, licences or permits (e.g. European Protected Species licences, Flood Risk Activity Permits).
- 3.19.6 The classification of an activity as a pre-commencement operation does not remove the obligation to comply with these controls, nor does it permit unrestricted or unmitigated works to take place.
- Breadth of Definition**
- 3.19.7 The Applicant notes concern regarding the scope of pre-commencement operations from Braintree District Council and Essex County Council. Both authorities have suggested that an additional tailpiece is added to the definition of pre-commencement operations.
- 3.19.8 Braintree District Council suggests: *‘except those operations which the relevant planning authority considers give rise to a materially new or different environmental effects beyond that considered in the Environmental Statement as notified to the undertaker by the relevant planning authority’.*
- 3.19.9 Essex Country Council suggests *‘those operations which the relevant planning authority considers give rise to a materially new or different environmental effect beyond that considered in the Environmental Statement as notified to the Undertaker by the relevant planning authority’*
- 3.19.10 The approach to pre-commencement operations is set out in **3.2 Explanatory Memorandum [APP-057]**, in particular paragraphs 3.6.6 and 3.6.7, which explain the purpose and operation of the definition within the wider Development Consent Order framework. This approach is also supported by recent precedent, including The National Grid (Bramford to Twinstead Reinforcement) Order 2024, where similar concerns raised by Essex County Council and Braintree District Council in relation to pre-commencement operations were not accepted by the Examining Authority or the Secretary of State.

- 3.19.11 The Applicant considers that the definition remains appropriate and proportionate, and that adequate control is secured through the DCO framework.
- 3.19.12 The absence of formal ‘commencement’ does not equate to an absence of control. All pre-commencement operations (as defined in Article 2(1) of **3.1 draft Development Consent Order [APP-056]**) must be carried out in accordance with the outline management plans and their appendices. In doing so, where any measures referenced in these management plans are to be agreed with the relevant Local Planning Authority, the Applicant must seek that agreement before carrying out any pre-commencement operations to which those measures are relevant. Pre-commencement operations do not disapply the controls of the management plans, nor do they permit works to proceed outside the parameters assessed by the Environmental Statement.
- 3.19.13 **Volume 6 - Environmental Statement** assesses the effects of the authorised development, including pre-commencement operations, on a reasonable worst case basis. Works giving rise to materially new or different environmental effects beyond those assessed would, by definition, fall outside the scope of the consented development.
- 3.19.14 The Applicant therefore considers that the safeguard sought by the proposed addition to the definition of ‘pre-commencement operations’ already exists as a matter of EIA and DCO principle, without the need for additional drafting. Introducing such wording would not add meaningful environmental protection beyond that already secured through the EIA process and the DCO framework.

Vegetation Removal

- 3.19.15 The Applicant notes concern raised by Essex County Council and Babergh, Mid Suffolk and Suffolk County Council that certain works classified as pre-commencement operations (including temporary laydown areas, construction compounds and bellmouths) could, in principle, involve vegetation removal prior to the discharge of Requirements relating to vegetation retention and removal.
- 3.19.16 The definition of pre-commencement operations in Article 2 of **3.1 draft Development Consent Order [APP-056]** does not disapply or override the control provided by the Requirements. Vegetation removal is controlled through the relevant Requirements. The approach to vegetation and tree removal is identified in Chapter 8 of **7.4 Outline Landscape and Ecological Management Plan [AS-047]**.
- 3.19.17 Requirement 8(1) of Schedule 3 (Retention and removal of trees, woodland and hedgerows) makes provision for ‘*Unless otherwise agreed with the relevant planning authority...*’. On this basis, the Applicant could seek to separately agree removal of trees, woodland and hedgerows with the respective Local Planning Authority if required as part of site clearance works provided by the definition of pre-commencement operations, although any removal would need to be the subject of appropriate condition and ecological survey to inform any decision and any relevant licences put in place if required. Regard should also be had to paragraph 1(4) under ‘Interpretation’ of Schedule 3 of **3.1 draft Development Consent Order [APP-056]** which states:

‘(4) Where an approval or agreement is required under the terms of any requirement or a document referred to in a requirement, or any requirement specifies “unless otherwise approved” or “unless otherwise agreed” by the relevant highway authority or the relevant planning authority, such approval or agreement may only be given

where it has been demonstrated to the relevant highway authority or the relevant planning authority that the subject matter of the approval or agreement sought will not give rise to any materially new or materially different environmental effects from those identified in the Environmental Statement.'

- 3.19.18 As noted in paragraph 1(4), this requires a written submission from the Applicant confirming that the proposed change would not give rise to materially new or materially different environmental effects from those already identified. The relevant discharging authority would need to be in agreement with both the assessment of effects and the proposals to undertake vegetation clearance earlier than anticipated.
- 3.19.19 Consideration should also be given as required to the DCO powers set out at articles 50 Felling or lopping, and 51 Trees subject to Tree Preservation Orders. Any vegetation removal would also need to be in accordance with the relevant provisions of the Outline Management Plans.
- 3.19.20 Accordingly, the Applicant considers that appropriate control is retained through the interaction of the definition, the Requirements, and the certified documents.

Historic Buildings

- 3.19.21 The Applicant notes Essex County Council's concern that pre-commencement operations could proceed without securing mitigation for historic buildings. The Applicant confirms this is not the case, as all pre-commencement operations must be undertaken in accordance with the outline Management Plans (draft Requirement 4) and **7.5 Outline Archaeological Mitigation Strategy and Written Scheme of Investigation [APP-328]** (draft Requirement 5), unless otherwise agreed with the Local Planning Authority and Historic England where applicable. Where works have the potential to affect heritage assets, the relevant mitigation must be secured prior to those works being carried out. Accordingly, while limited investigatory and enabling activities may take place pre-commencement, this does not permit works that would prejudice heritage assets or bypass agreed mitigation, and **3.1 draft Development Consent Order [APP-056]** provides a clear and robust framework that fully safeguards historic buildings.

Pre-commencement Surveys of Listed Buildings

- 3.19.22 The Applicant notes Essex County Council's request that pre-commencement surveys of listed buildings should be expressly included within the definition of pre-commencement operations and will consider this request.

Demolition of Buildings

- 3.19.23 The Applicant notes the request for clarity on buildings proposed for demolition as part of pre-commencement operations by Babergh, Mid Suffolk and Suffolk County Council. The Applicant has not currently identified any buildings that would need to be demolished. If demolition was to be required, it would be due to unforeseen circumstances. Any demolition activities are within the scope of the authorised development and have been assessed within the Environmental Statement. Demolition is also subject to compliance with the relevant Requirements, heritage controls, and environmental management measures.

Surveys

- 3.19.24 The Applicant notes Thurrock Council's concerns that the current provisions of the draft DCO permit the carrying out of investigations and surveys, regardless of whether these are intrusive or non-intrusive, without agreement of the Council and that the Council requires that, at a minimum, a Licence Agreement and details of the investigation(s)/survey(s) must be agreed and in place prior to the carrying out of those pre-commencement operations.

4. Planning and Environmental Topics

4.1 Introduction

- 4.1.1 This chapter sets out the Applicant's comments on the matters raised in the Local Impact Reports that are related to the topics in the Environmental Statement, together with planning policy matters to the extent they have not already been covered in this document. The headings for each section within this chapter align with the terminology used in the ExA's Initial Assessment of Principal Issues (IAP1), with the topic names used in the Applicant's Environmental Statement (ES) provided in brackets if they differ. Note that, as an example, IAP1 scope relating to Land Use is considered in this chapter to the extent it relates to the Applicant's ES topic Agriculture and Soils; IAP1 scope relating to Land Use also is considered in chapter 3, see section on Green Belt. Planning Policy and the scope of the ES topic Contaminated Land, Geology and Hydrogeology do not seem to be covered in the IAP1, but have been included in this document for completeness. The section titled Environmental Impact Assessment – General covers matters relating to Environmental Impact Assessment (EIA) generally, as well as decommissioning, climate, waste, major accidents and disasters, and outline management plans.
- 4.1.2 The Applicant has been engaging with host Local Authorities since early project development in 2022. This is not only through formal consultation (both non-statutory and statutory), but also through regular thematic group meetings. The matters and impacts covered in this chapter have generally been covered in discussions with one or more host Local Authorities. These discussion of these matters is reported within relevant Statements of Common Ground and **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**. Each Local Authority Statement of Common Ground includes a Record of Key Engagement section, which contains a table listing the key engagement activities between the Applicant and that Local Authority. Table 1.1 of this document provides Examination Library reference numbers for the Statements of Common Ground.
- 4.1.3 The Applicant is continuing to engage with host Local Authorities to progress any matters that remain under discussion, and will submit updated Statements of Common Ground at examination deadlines as requested by the ExA.
- 4.1.4 The Statements of Common Ground relating to the Local Authorities cover Environmental Statement topics, and, for each of those topics, matters (whether agreed, under discussion or not agreed) in relation to:
- Regulations, planning policy context and guidance
 - EIA approach and methods
 - Baseline conditions
 - Mitigation measures (Embedded, Standard, Additional)
 - Assessment conclusions
 - Draft Development Consent Order / Outline Management Plans / Mitigation and Monitoring

4.2 Planning Policy

Introduction

- 4.2.1 All of the submitted Local Impact Reports raised matters pertaining to Planning Policy in the sections of the Local Impact Reports cited in the table below. The Local Impact Reports include signposting to their respective adopted and emerging development plans. The Applicant notes that not all Local Impact Reports signpost to National Policy Statements or note that the Project is Critical National Priority Infrastructure.
- 4.2.2 Section 104(2) of the Planning Act 2008 sets out the matters to which the SoS must have regard in deciding an application submitted in accordance with the Planning Act 2008. In summary, the matters set out in section 104(2) include any relevant NPS, any local impact report (LIR); and any other matters the SoS thinks are both important and relevant to the decision. The Applicant has produced a Policy Compliance Document (APP-086) in accordance with the Planning Inspectorates Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus (June 2025). This states that the Policy Compliance Document should include *'itemised evidence for how the policy requirements established within any relevant National Policy Statement(s)) and other important national and local policy documents are satisfied by the application.* The Policy Compliance Document sets out how the Project meets the policy requirements sets out in NPS EN-1, EN-3 and EN-5 (2024) and the NPPF (2025) and how the Project has had due regard to local planning and neighbourhood plan policies. The Project has been assessed against the updated NPS EN-1, EN-3 , EN-5 (2026), consultation draft NPPF and local plan policies identified since 1 April 2025, and this is reported in the **8.4.2 Policy Compliance Tracker [REP1-133]** which was submitted at Deadline 1. A further iteration of the Policy Compliance Tracker will be issued at Deadline 4, and this will include an assessment of the Project against policies identified in Local Impact Reports which were not captured in the Policy Compliance Document (APP-086).

Local Authority Positions

- 4.2.3 All Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 4.1 Planning Policy - Local Impact Report coverage

Local Authority	LIR Sections covering this topic
Norfolk County Council	Section 4, Paragraphs 6.5 – 6.10, 7.2 – 7.6, 8.3, 9.2-9.3, 10.3-10.7, 11.3-11.11, 12.2-12.3, 13.2-13.4 (see the table below for detailed responses to paragraph 10.5)
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	Section 4 (see the table below for detailed responses to paragraphs 4.5)
Essex County Council	Section 3, Section 4 and Appendix A

Local Authority	LIR Sections covering this topic
	(see the table below for detailed responses to paragraphs 4.3.15, Appendix A, 4.3.28, 4.3.29, 4.3.71)
Thurrock Council	Section 5 and Section 6 (see the table below for detailed responses to paragraphs 6.8.24, 6.14.27 – 6.14.29, 6.16.11, 6.15.1)
South Norfolk District Council	Section 1.3, Section 6, Section 8, Section 11 and Appendix A (see the table below for detailed responses to paragraphs 6.2)
Tendring District Council	Sections 5, 6, 7, 8, 10, 19 and 20 (see the table below for detailed responses to paragraphs 5.13, 6.1, 20.18)
Colchester City Council	Section 2, Section 3 and Section 12 (see the table below for detailed responses to paragraphs 12.104 – 12.108, 2.9, 12.76)
Braintree District Council	Section 5 and Section 15 (see the table below for detailed responses to paragraphs 15.3.2)
Chelmsford City Council	Section 5, Section 7 and Section 8 (see the table below for detailed responses to paragraphs 7.13, 8.5 – 8.27, 8.33)
Brentwood Borough Council	Section 5 and Section 6 (see the table below for detailed responses to paragraphs 5.0, 6.4)

Responses to New Matters and Applicant Clarifications

- 4.2.4 The table below sets out the Applicant's response to the matters raised in the Local Impact Reports that the Applicant previously has not addressed in their documents, including Statements of Common Ground with Local Authorities or in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**.

Table 4.2 Planning Policy – Responses to New Matters and Applicant Clarifications

ID	Stakeholder	Comment	NG response
Colchester 12.104 – 12.108	Colchester City Council	Additionally, there is a concern that the impact of constructing three pylons on open access land near Fordham is not proposed to be satisfactorily compensated by the applicant. National Policy Statement EN-1 states that “5.11.9 Applicants will need to consult the local community on their proposals to build on existing open space, sports or recreational buildings and land. Taking account of the consultations, applicants should consider providing new or additional open space including green and blue infrastructure, sport or recreation facilities, to substitute for any losses as a result of their proposal” Paragraph 5.11.24 of EN-1 goes on to state that ‘Where green infrastructure is affected, the Secretary of State should consider imposing requirements to ensure the functionality and connectivity of the green infrastructure network is maintained in the vicinity of the development and that any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space’. Paragraph 5.11.25 of EN-1 adds that ‘The Secretary of State should also consider whether any adverse	An assessment of the Project's interaction with the Fordham Hall Estate is presented in Appendix B (site reference OS/50) of the 5.6 Planning Statement [APP-085]. Based on the indicative pylon locations in the alignment, there are three pylons proposed to be sited within the Fordham Hall Estate, TB46, TB48 and TB49. Whilst public access is permissible on the Fordham Hall Estate, visitors are only allowed to deviate from paths where the land is occupied by the Woodland Trust. Pylons TB48 and TB49 are to be located on areas of the site which are outside of the areas leased to the Woodland Trust and where third-party grazing licences exist. The proposed locations for these two pylons are therefore outside the area of the estate which is publicly accessible beyond the established network of pathways and are located away from pathways on the site, with the nearest pathway located approximately 40 metres to the south of pylon TB49. TB46 is also proposed to be located within the Estate but in an area which is not farmed and that is leased by the Woodland Trust. The only walking route that has been identified in this area traverses the eastern outer extent of the land parcel away from the proposed

ID	Stakeholder	Comment	NG response
		effect on green infrastructure and other forms of open space is adequately mitigated or compensated by means of any planning obligations, for example exchange land and provide for appropriate management and maintenance agreements. Any exchange land should be at least as good in terms of size, usefulness, attractiveness and quality, and accessibility’. It is requested that the applicant provides clarity as to how the impact on open access land in Fordham will be compensated.	location of the pylon. However, because this area is leased to the Woodland Trust, who the Applicant understands do not actively prohibit public access to this part of the site, as a precautionary approach it has been assumed that the area around the proposed location for pylon TB46 may be publicly accessible. The permanent works proposed within the Fordham Hall Estate are limited to the footprint of three pylons (of approximately 11.6sqm each) which will not prohibit public access to the Estate or impact on the functionality or connectivity of the green infrastructure. However, taking a precautionary approach to the assessment of the impact on open space in respect of pylon TB46, an assessment of provision of existing open space has been carried out using a relevant Local Authority Assessment within Appendix B in accordance with paragraph 5.11.10 of National Policy Statement EN-1. In doing this, it is identified that the Colchester Borough Council Open Space Report (April 2023)⁴⁹ displays a surplus of open space both within the locality of Fordham Hall Estate and within the wider Colchester area. The possibility of providing exchange land has nevertheless been considered as part of the Special Category Land Report (see further below) but no suitable exchange land has been identified. Therefore, given that: any loss of open space land (noting the precautionary approach) is limited to the pylon footprint;

⁴⁹ Knight, Kavanagh and Page (2023) *Colchester Borough Council Open Space Report*

ID	Stakeholder	Comment	NG response
			- the land will continue to function as open space even with the proposed works; - a surplus of open space has been identified in the local authority area; and - no suitable exchange land has been identified - delivery of additional compensatory open space is not proposed. - Mitigation and compensatory planting is however proposed in respect of the impact of tree and vegetation removal within the areas of Open Space. Where trees have to be removed within areas of Open Space to deliver the Project, we have committed to a 3:1 replacement for individual trees and trees within groups. Where possible, trees will be replanted in the same, or in close proximity to, the location from which they were removed. If constraints preclude tree planting in the same or in close proximity to where they were removed, tree planting will be undertaken as close as possible to the original location. If it is not possible to provide tree planting within the Order Limits, then offsite provision as close to the Order Limits as possible will be provided. In full, the assessment made in respect of the Fordham Hall Estate within Appendix B of the 5.6 Planning Statement [APP-085] establishes that the Project complies with the requirements of National Policy Statement EN-1⁵⁰.

⁵⁰ Department for Energy Security and Net Zero (2024) *Overarching National Policy Statement for Energy (EN-1)*

ID	Stakeholder	Comment	NG response
			In addition to assessment of Open Space pursuant to paragraph 5.11 of National Policy Statement EN-1, for completeness the Applicant would also note that Fordham Hall Estate has also been considered on a precautionary basis as potential Special Category Land in Appendix C of the Statement of Reasons [APP-062]. For the reasons set out in paragraphs 6.1.8 - 6.1.28 of the Special Category Land Report we do not consider this land to constitute open space under s132 of the Planning Act 2008, however we have assessed the land as open space under s132 of the Act on a precautionary basis, were the Secretary of State to take a contrary view. As part of that assessment, it is the Applicant's view that the land, when burdened with the rights sought, will be no less advantageous than it is currently as there will be no impact on the use, or function of the land. Notwithstanding the Applicant's position that the no less advantageous exemption under s132(3) applies in respect of the rights sought over this area the Applicant has also considered the availability of suitable exchange land. In all immediate cardinal directions, and within the immediate vicinity of the parts of the Estate that interact with the Order Limits, land is worked agricultural fields or is land already leased to the Woodland Trust. It is the Applicant's position that the use of agricultural land as exchange land would be contrary to and inconsistent with its continued function as agricultural land. Changes to the agricultural function of this land in this location by acquiring such land to function as Open Space, would impact long standing agricultural

ID	Stakeholder	Comment	NG response
			tenants. In these circumstances, such land would not be suitable land to be provided in exchange for the rights sought over this potential area of open space. Therefore, in the area immediately beyond the Order Limits there is no suitable replacement land that could be given in exchange for, and serve the same purpose as, any open space land over which permanent rights for the Project are to be sought.
Thurrock 6.8.24 Thurrock 6.14.27 – 6.14.29	Thurrock Council	There may be open spaces which are used recreationally which could be impacted by disruption to access or changes in amenity for users of those spaces. This could have consequential impacts on the achievement of increasing the levels of participation in physical activity by adults and children across the Borough but particularly in the areas of Orsett, Stanford-le-Hope and East Tilbury. In addition, there does not appear to be an assessment of the potential impacts on leisure and recreational opportunities at Orsett Golf Club, following the re-location of the proposed sub-station from Tilbury to Orsett. This needs to be included in the assessment to meet the requirements of the NPS EN-1. The submitted documents identify key open spaces and PRoW in Thurrock, but the assessment of Recreation and Leisure is high level and not presented as a separate, detailed topic. There is not a clear explanation as to how construction will affect everyday use of parks, playing fields or community activities, which makes it difficult	A comprehensive assessment of impacts of the Project on open space and recreational opportunities is made within Appendix B of the 5.6 Planning Statement [APP-085]. Appendix B considers impacts both during construction and operation. Appendix B, and the accompanying text in Sections 7.3.430 – 7.3.476 of the 5.6 Planning Statement [APP-085], display that the Project complies with relevant policy on open space and recreation as set out in National Policy Statement (NPS) EN-1. In Thurrock, nine sites (OS/104 – OS/112) that are considered open space/green infrastructure are identified as either being within or adjacent to the Order Limits and are assessed within Appendix B. Of these nine sites, no development is proposed in three of them. This includes OS/104 and OS/109, where overlaps with the Order Limits exist but no development will be taking place within them and OS/110 which falls outside the Order Limits. Four of the sites (OS/108, OS/109, OS/111 and OS/112) are included within the Assessment as they overlap with the Order Limits as a result of works to the existing YYJ and ZB 400 kV overhead lines. These four sites interact with the extent of the YYJ and ZB

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		to confirm alignment with NPPF requirements to protect valued recreational spaces. There is also not a clear, specific mitigation for recreation and leisure, so it is not possible to confirm whether the proposals meet Thurrock Core Strategy policies CSTP9 and CSTP20 on safeguarding leisure and open space.	lines specified in Scenario A for connection to the Tilbury North Substation as set out in Section 11.4 of the 5.15 Design Development Report [APP-122]. As set out in the Applicant's Letter to the Examining Authority dated 9 February 2026 [AS-084], the Applicant has confirmed that it intends to pursue Scenario B for connection to the Tilbury North Substation (Section 11.4 of the 5.15 Design Development Report [APP-122]). Scenario B consists of more limited modifications to the existing YYJ and ZB lines. Resultantly, works will no longer be taking place on or near to these four sites. Works to existing overhead line infrastructure associated with the 400 kV PAB are proposed within site OS/107 (Linford Pit - local wildlife site). These works will be temporary in nature. The site is in private ownership with no public access and so there will be no impact on recreation or leisure. The site has been included within the open space assessment on a precautionary basis as it falls within the definition of green infrastructure. Elsewhere, where temporary disruption is caused to these areas it is not considered that this will have material impacts on the physical wellbeing of local populations, in terms of access to open space. Appendix B.3 of the 5.6 Planning Statement [APP-085] explains that there is significant alternative open space provision in the locality of Maple Park (not including Maple Park itself, which will retain much of its current function). It is established below that significant golf course provision also exists in the wider locality of Orsett.

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			Construction works will take place, and permanent infrastructure will be sited, in both Maple Park (OS/105) and Orsett Golf Course (OS/106). Whilst efforts have been made to avoid these open space sites, this has not been possible. Detail on the implications for these open space sites is set out below. <u>Maple Park (OS/105)</u> Based on the indicative pylon locations in the alignment, there are two pylons TB257 and TB258 which are proposed to be sited in the south west corner of Maple Park and rights are proposed to be acquired for a permanent access road to access these pylons. The siting of these pylons within Maple Park will also entail an oversail between them. It is proposed that the permanent access route will utilise an existing track. Appendix B.3 of the 5.6 Planning Statement [APP-085] considers the impacts of the permanent siting of the two pylons which would entail the loss of open space around the base of the pylon footprint. Whilst the use and function of the open space in this part of the park will be impacted by the siting of the pylons, the impact will be restricted to a small section of Maple Park (which is furthest away from residential development) with impact limited to the pylon/tower base foundations (approximately 34sqm in total) in the context of a park which is significant in size (42.3ha). Notwithstanding this, an assessment of the provision of open space has been completed in line with paragraph 5.11.10 of National Policy Statement EN-1. Appendix

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			B.3 establishes that there is a significant surplus of open space in the locality. This surplus provides ample alternative opportunity for participation in physical activity. Therefore, not only will opportunities for use of this area of open space within Maple Park be largely unchanged as the two pylons occupy a small area in the south-western corner of Maple Park. The wider Maple Park (not included within the area of Surplus land identified in the assessment made in Appendix B.3) will also be available for participation in recreation. leisure and physical activity once the Project is constructed and there is a significant surplus of open space in the locality. <u>Orsett Golf Course (OS/106)</u> At Orsett Golf Course, the 16th and 17 holes will be oversailed, and pylon TB262 will be sited between a practice area and the south of the 16th green. Due to route constraints and environmental features along with the need to connect to Tilbury North Substation, the overhead lines must take a route across this part of the golf course. The Limits of Deviation were drawn to allow for appropriate flexibility to agree details with Orsett Golf Course. Positive engagement has taken place between the golf course and the Applicant in relation to mitigation, and this has led to the identification of an agreed solution, the details of which are being finalised through a Statement of Common Ground. This includes a minor change to the routeing to ensure as little impact as possible to the 16th and 17th holes. Effects on the

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			practice ground have been identified and an agreement to modify the practice facility provision has been reached as a result. The agreed alignment sees pylons positioned to the north of the 17th fairway and to the south of the 16th fairway (with no pylon between the fairways) with connections to gantries positioned to the edge of the substation site. Impacts of the Project on Orsett Golf Course are set out at length in Sections 7.3.472 – 7.3.473 and 7.3.593 – 7.3.596 of the 5.6 Planning Statement [APP-085]. The implications for open space are detailed in Appendix B (site reference OS/106). The assessment within Appendix B, and mitigation currently being discussed, display compliance with the requirements of NPS EN-1. Appendix B, as summarised, acknowledges an impact as a result of the pylon located within the practice area and oversailing. However, it notes that there will be no loss of the golf course facility which will remain available for use. Fundamentally, this assessment concludes that the benefits of the Project (including need) outweigh the impact on the practice area at this facility and as explained above, positive engagement has taken place between the golf course and the Applicant in relation to mitigation, and this has led to the identification of an agreed solution, the details of which are being finalised through a Statement of Common Ground. <u>Thurrock Core Strategy Policy CSTP9</u>

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			Policy CSTP9 relates to health and wellbeing and seeks to ensure access to leisure and sports facilities through the provision of <i>'high quality sports and leisure facilities and appropriate spaces for those that live, work, and visit the borough'</i>. It prioritises the safeguarding of existing open space facilities to protect against a loss of provision and require the provision of alternative provision where a loss of a facility is proposed. There is no loss of a facility as a result of the proposed works. As explained above, the permanent impact of the Project will be limited to two small specific areas of much larger areas of open space, being Maple Park and Orsett Golf Course. The Project would not prejudice the provision of open space in these areas for access to leisure and sports facilities. In the case of Maple Park, a small area of a much larger open space will be impacted. In the case of Orsett Golf Course, efforts have been made to limit impact, and an agreement has been reached which mitigates potential impacts on the golf course. Elsewhere, as set out above, there may be temporary impacts on areas of open space associated with construction of the Project. However, Policy CSTP9's relates to safeguarding against the loss of open space facilities. Open space will not be lost in areas where temporary works are proposed as these areas will be reinstated following the completion of works. <u>Thurrock Core Strategy Policy CSTP20</u> Policy CSTP20 seeks to promote the provision of open space in new development. This response, as well as

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			Appendix 2 of the 5.6 Planning Statement [APP-085] , establish the impact of the Project on open space and find that these impacts are acceptable.
10.5	Norfolk County Council	Even where the CNP allows infrastructure “to be treated as if it has met any tests which [...] requires a clear outweighing of harm, exceptionality or very special circumstances”, it is clear that flood risk must be mitigated to an acceptable and safe level. This is reinforced by paragraph 4.2.28 which explicitly states that there is an exception to the CNP presumption of consent for residual impacts which present an unacceptable risk to human health and public safety, as well as for residual impacts which present an unacceptable risk to, or unacceptable interference to flood risk. Where the CNP assumption is applied to flood risk issues, it is clear that the SoS must very carefully justify their decision and explicitly set out their reasoning.	The Project is Critical National Priority Infrastructure. An assessment of the Project against CNP policy is included in the 5.6 Planning Statement [APP-085]. It is noted that Norfolk County Council has referenced the version of NPS EN-1 which came into force in January 2026. However, paragraph 4.2.28 is replicated at 4.2.15 in the 2024 NPS EN-1 which states that <i>‘Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts. The exception to this presumption of consent are residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.’</i> The Applicant has submitted the following documents to support the application for development consent: 7.9 Flood Risk Assessment [APP-331]; 6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221] and

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			mitigation measures included in the Outline Code of Construction Practice (Revision B) that has helped shape and inform a professional judgement. The Planning Statement [APP-085] has concluded that the Project would not present an unacceptable flood risk that would disapply the CNP status. The tests set out in paragraphs 4.2.16 - 4.2.17 of NPS EN-1 (2024) have been met, the mitigation hierarchy has been applied and the further CNP presumption in favour of the Project applies to the planning balance and outweighs such residual effects identified at 4.2.15.
6.2	South Norfolk District Council	The statutory development plan for South Norfolk consists of: • The Greater Norwich Local Plan (GNLP), adopted March 2024, covering Broadland, South Norfolk and Norwich; • The South Norfolk Local Plan – Development Management Policies (2015). These documents remain the primary basis for planning decision-making within the district and therefore carry full weight in the assessment of local impacts arising from the proposed 400kV overhead line.	The Applicant has had regard to Local Planning Policy including the Greater Norwich Local Plan (2024) and the South Norfolk Local Plan - Development Management Policies Document (2015) where considered relevant and applicable – see 5.6 Planning Statement [APP-085] and 5.7 Policy Compliance Document [APP-086]. NPS EN-1 and EN-5 (2024) together form the primary policy for decision-making on NSIP proposals relating to new electricity transmission infrastructure. Relevant local planning policy documents may also be considered where they provide useful context to the assessment of local effects important and relevant to decision-making. Local planning policy is a material consideration under section 104(2)(d) of the Planning Act 2008 and can be afforded weight proportionate to

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			its relevance, currency and consistency with national policy, but national policy remains the primary policy consideration.
4.5	Suffolk County Council	EN -1 also recognises that new grid projects are Critical National Priority (CNP) network infrastructure (paras 3.3.70 and 4.2.5) but, as explained in para 4.2.7, the CNP policy is applied “following normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy.” EN-1 also indicates that “Applicants for CNP infrastructure must continue to show how their application meets the requirements in this NPS and the relevant technology specific NPS, applying the mitigation hierarchy, as well as any other legal or regulatory requirements.” The CNP policy therefore does not absolve an applicant from needing to address the impacts of a project by following the mitigation hierarchy of seeking to avoid, reduce, mitigate, or compensate for adverse impacts.	The 5.6 Planning Statement [APP-085] explains that the Project is critical national priority infrastructure as defined in National Policy Statement EN-1. Without reinforcement, the capacity of the existing network in East Anglia and the South East is insufficient to accommodate the connection of proposed new power sources connecting in the area. As such, the Project is considered to be a means of all of the following: • Connecting a new generating station or storage facility to the network • Reinforcing the network to accommodate such connections, and • Reinforcing the network to ensure that it is sufficiently resilient and capacious. Given the Project qualifies as CNP Infrastructure, paragraph 3.3.63 of EN-1 confirms the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh the residual effects that remain following application of the mitigation hierarchy as set out in 6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135] and 5.6 Planning Statement [APP-085]. NPS EN-1 paragraph 4.2.16 sets out that where a project is CNP Infrastructure the Secretary of State will take as a starting point for decision making that that such infrastructure is to be treated as if it has met any

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			tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.
	Essex County Council	Section 3 of the LIR identifies the policy context noting that When deciding DCO submissions s104(2)(d) of the Planning Act (PA) 2008 requires the Secretary of State (SoS), following recommendation by the Planning Inspectorate (PINS) to have regard to any other matters considered both important and relevant. Essex Council also identify relevant district level local plans including: • Basildon District Local Plan Saved Policies 2007 • Braintree District Local Plan 2033 • Brentwood Local Plan 2016-2033 • Chelmsford Local Plan 2013-2036 • Colchester Local Plan (Section 1) 2013-2033 • Colchester Local Plan (Section 2) 2017-2033 • Tendring District Local Plan 2013-2033 • Thurrock Core Strategy and Policies for Management of Development (Core Strategy)	The Applicant notes the Local Plan documents which have been identified by Essex County Council as being relevant to the Project. The Applicant has had regard to the relevant district level local planning policy where they are considered relevant and applicable – see 5.6 Planning Statement [APP-085] and 5.7 Policy Compliance Document [APP-086]. The Applicant notes that there is no reference to Critical National Priority Infrastructure within the LIR (see Chapter 2 – Overarching Policy Context of this document). The Applicant provides a summary of the planning balance in Chapter 8 of the 5.6 Planning Statement [APP-085] in accordance with the NPS EN-1 and EN-5 framework, following a detailed assessment of the Project and its likely effects. Pursuant to paragraph 3.2.7 of NPS EN-1 (2024), substantial weight should be given to the need for energy infrastructure when considering applications for development consent. Paragraph 4.1.3 also sets out a presumption in favour of granting consent for energy Nationally Significant Infrastructure Projects (NSIPs). EN-1 further provides that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. The CNP Policies address how residual effects are considered in the planning balance.

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			Given the Project qualifies as CNP Infrastructure, paragraph 3.3.63 of EN-1 confirms the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh the residual effects that remain following application of the mitigation hierarchy as set out in 6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135] and 5.6 Planning Statement [APP-085]. EN-1 paragraph 4.1.7 provides ‘... <i>For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases</i>’. The Applicant considers that the substantial need for the Project is clear and urgent and the mitigation hierarchy has been applied, all in accordance with EN-1 and EN-5. The residual environmental effects identified by Essex County Council fall within the category of non-HRA or non-MCZ impacts where, following the application of the mitigation hierarchy, the further CNP presumption in favour of the Project applies to the planning balance and outweighs such residual effects.
4.3.15 and Appendix A	Essex County Council	The adjacent Basildon and Thurrock Councils are also in the process of preparing new Local Plans to guide future development of their respective areas. This could include further growth between Basildon, DHGV and West Horndon, which would lead to a continuation of the area allocated for residential development at DHGV as part of what in effect is, a larger Garden Community as demonstrated by the	The Applicant is aware of the Expression of Interest (EoI) submitted to the New Towns Task Force. The area identified in the EoI includes the Dunton Hills Garden Village and emerging allocation H11 (identified in the Basildon Local Plan Regulation 18 Consultation). The emerging allocation also includes land subject to the following planning applications:

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		joint Expression of Interest to the New Towns Task Force last year (Appendix A).	24/00729/FULL: Redevelopment of the site to provide 146 residential dwellings (Class C3); provision of strategic landscape; provision of new vehicular and pedestrian access routes and associated infrastructure. 25/00541/OUT: Outline Planning Application (all matters reserved except for means of vehicular access into the site from Mandeville Way and Lower Dunton Road) for residential development of up to 375 dwellings (Use Class C3) and an early years childcare facility (Use Class E), together with car parking, public open space, landscaping, drainage, and other associated works. The Applicant does not consider that the Project will result in any significant impact with regard to the viability of the individual development proposals and emerging allocations which form the basis of the EoI. The Applicant considers that overhead electricity lines can be successfully co-located with development provided that the statutory safety clearances are maintained in accordance with the Electricity Safety, Quality and Continuity Regulations 2002. National Grid has produced its Design Guidelines for development near high voltage overhead lines, which set out these statutory safety clearances and provide detailed guidance for developers on how successful co-location can be achieved in practice. Accordingly, National Grid does not consider that the Norwich to Tilbury Project would adversely affect the delivery of the proposed site allocations, subject to the future development of those sites having full regard to this guidance. In this context, National Grid

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			recommends that the policies relevant to these allocations explicitly reference the need to comply with both the Electricity Safety, Quality and Continuity Regulations 2002 and National Grid's Design Guidelines for Development Near Pylons and High Voltage Overhead Power Lines, in order to facilitate successful development, should the Norwich to Tilbury Project Development Consent Order be granted.
4.3.28 and 4.3.29	Essex County Council	Formulation of the adopted Brentwood Local Plan, including the allocation of DHGV, pre dates the pre application process for the Norwich to Tilbury proposals. ECC and local authority partners made the Applicant aware of DHGV at initial project meetings. Within its consultation response, ECC highlighted the locally significant effects arising from the proximity of the proposed pylons and overhead power lines to the proposed residential development and the fact that the proposed route was encroaching into the site. This important strategic site allocation therefore should have been fully taken into account to inform the evolution and design development of the Norwich to Tilbury project and its routing. National Grid should have given significant weight to the effect of the pylon route on the overall deliverability of the new homes, infrastructure and environmental benefits at DHGV, which is in accordance with adopted local and national planning policy TCPA principles.	Commentary on DHGV is addressed in the Alternatives- Dunton Hill Garden Village section of this report.
4.3.71	Essex County Council	Savills also advised that Authorities should be aware of the potential effect of the Norwich to Tilbury scheme on the development of land beyond DHGV. In particular, reference is made to draft policies E5	The Applicant has engaged with Basildon Borough Council through their Regulation 18 Consultation. Noting the interaction between the Project and the emerging allocations E5 and H11, The Applicant

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		and H11 in the emerging local plan for Basildon Borough Council (a Regulation 19 consultation is expected to commence shortly concurrent with the examination process) which relates to potential new site allocations for development to the west of West Mayne in Basildon for the delivery of employment uses and up to 1,800 homes and associated infrastructure, respectively.	considers that overhead electricity lines can be successfully co-located with development provided that the statutory safety clearances are maintained in accordance with the Electricity Safety, Quality and Continuity Regulations 2002. National Grid has produced its Design Guidelines for development near high voltage overhead lines, which set out these statutory safety clearances and provide detailed guidance for developers on how successful co-location can be achieved in practice. Accordingly, National Grid does not consider that the Norwich to Tilbury Project would adversely affect the delivery of the proposed site allocations, subject to the future development of those sites having full regard to this guidance. In this context, National Grid recommends that the policies relevant to these allocations explicitly reference the need to comply with both the Electricity Safety, Quality and Continuity Regulations 2002 and National Grid’s Design Guidelines for Development Near Pylons and High Voltage Overhead Power Lines, in order to facilitate successful development, should the Norwich to Tilbury Project Development Consent Order be granted.
5.13	Tendring District Council	TDC intends to submit its new Local Plan to the PINS for Examination by the end of 2026, and a Regulation 18 public consultation is currently under way (as of February 2026). The policies within the emerging Local Plan should therefore be afforded appropriate weight, reflecting the progress expected throughout 2026 and into 2027—coinciding with the anticipated determination of the N2T DCO by the Secretary of State.	The Applicant notes the work being undertaken on the emerging local plan. A response to the current Local Plan consultation will be made by National Grid. The Project has been assessed against the emerging local plan policies, and this is reported in the 8.4.2 Policy Compliance Tracker [REP1-133] which was submitted at Deadline 1.

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6.1	Tendring District Council	TDC acknowledge that enhanced transmission infrastructure will play a central role in tackling climate change and in meeting Government targets in the lead up to net-zero by 2050. As part of the Great Grid Upgrade therefore, N2T is recognised as a proposal that would contribute to the decarbonisation of the UK's energy supply, in accordance with the Clean Power 2030 Action Plan, helping to deliver the Government targets of net zero.	The Applicant notes that Tendring District Council has acknowledged that enhanced transmission infrastructure will play a central role in tackling climate change and in meeting Government targets in the lead up to net-zero by 2050. The Applicant welcomes TDC acknowledgement that the Project would contribute to the decarbonisation of the UK's energy supply, in accordance with the Clean Power 2030 Action Plan, helping to deliver the Government targets of net zero. NPS EN-1 (2026) includes additional emphasis on the Clean Power Action Plan 2030 stating that <i>'Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure to meet the Clean Power 2030 Mission and net zero'</i>. The NESO's Clean Power 2030 report (Annex 2) identifies the Project as critical to delivering a network which supports the clean power pathways, but at present has a delivery date after 2030. Support is therefore needed to bring the Project forward for 2030 delivery. NESO's Clean Power 2030 report also states that the Project (AENC and ATNC – the Network Options Assessment code for Norwich to Tilbury) and Sea Link are critical for connecting offshore wind in the North Sea and supporting the flow of clean power. Constraint costs arise when NESO has to manage this problem by paying generators to reduce (turn-down) their electricity output in areas that are congested and switch on (turn-up) in locations closer to electricity users. The specific reference to the Project in the Clean Power 2030 report provides additional

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			recognition of the need for the Project to what is stated on the need for new electricity networks. The Applicant notes that there is no reference to Critical National Priority Infrastructure within the LIR (see Chapter 2 – Overarching Policy Context section of this document). The Applicant provides a summary of the planning balance in Chapter 8 of the 5.6 Planning Statement [APP-085] in accordance with the NPS EN-1 and EN-5 framework, following a detailed assessment of the Project and its likely effects. Pursuant to paragraph 3.2.7 of NPS EN-1 (2024), substantial weight should be given to the need for energy infrastructure when considering applications for development consent. Paragraph 4.1.3 also sets out a presumption in favour of granting consent for energy Nationally Significant Infrastructure Projects (NSIPs). EN-1 further provides that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. The CNP Policies address how residual effects are considered in the planning balance. Given the Project qualifies as CNP Infrastructure, paragraph 3.3.63 of EN-1 confirms the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh the residual effects that remain following application of the mitigation hierarchy as set out in 6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135] and 5.6 Planning Statement [APP-085].

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			EN-1 paragraph 4.1.7 provides ‘... <i>For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases</i>’. The Applicant considers that the substantial need for the Project is clear and urgent and the mitigation hierarchy has been applied, all in accordance with EN-1 and EN-5. The residual environmental effects identified by Essex County Council fall within the category of non-HRA or non-MCZ impacts where, following the application of the mitigation hierarchy, the further CNP presumption in favour of the Project applies to the planning balance and outweighs such residual effects.
20.18	Tendring District Council	Referencing NPS EN-1 and EN-5, the following grounds are central to TDC’s position: • EN-1 sections 5.10.16–5.10.25 require accurate baseline data, full identification of sensitive landscapes, and demonstrably minimised negative effects. • EN-5 section 2.11.5 states the presumption is to avoid overhead lines in nationally designated landscapes and consider their setting. • EN-5 section 2.9.24 requires proper evaluation of alternatives including undergrounding where adverse impacts are high.	The Applicant has set out in the 5.7 Policy Compliance Document [APP-086] how the Project accords with these policy requirements. In considering the reference to EN-1 Sections 5.10.16 – 5.10.25, ES Chapter 13: Landscape and Visual [APP-226] presents the landscape and visual assessment. Reference to landscape character assessments have been made in ES Chapter 13: Landscape and Visual [APP-226] accompanied by: • ES Appendix 13.1: Landscape and Visual Methodology [APP-227] • ES Appendix 13.2: Landscape Baseline and Assessment [APP-228] • ES Appendix 13.3: Visual Baseline and Assessment [APP-229 to APP-232] • ES Appendix 13.4: Residential Visual Amenity Assessment [APP-233 to APP-234]

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			• ES Appendix 13.5: National Landscape Assessment Study [APP-235] • ES Appendix 13.6: Arboricultural Impact Assessment (AIA) [APP-236] Published landscape character documents have been used as a means of assessing landscape effects, as described in ES Appendix 13.2: Landscape Baseline and Assessment [APP-228] Relevant local development plan documents that were taken into account in the assessment are set out in Section 13.2: Regulatory and Planning Policy Context of ES Chapter 13 [APP-226]. Embedded measures have been integral in reducing, and where possible, avoiding, the landscape and visual effects of the Project. Landscape and visual matters were considered in the early stages of siting and design. ES Chapter 3: Alternatives [APP-127] which documents the key environmental factors that were considered in the optioneering and design evolution process, alongside the Design Development Report [APP-122], Design and Access Statement [APP-353], Design Approach for Site Specific infrastructure [APP-354] and ES Chapter 3: Alternatives [APP-127] summarises the different choices made during the design process. Chapter 5 of the Planning Statement [APP-085] sets out how planning policy, namely EN-1 and EN-5, as well as the requirements of the Electricity Act and the principles of the Holford and Horlock Rules have influenced the options appraisal process; demonstrating how such policy objectives have been embedded into the design of the Project.

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			ES Appendix 13.5: National Landscape Assessment Study [APP-235] considers the natural beauty, character and special qualities of Dedham Vale National Landscape. The National Landscape Assessment Study also sets out an assessment of the impacts of the Project on the special qualities of the National Landscape and how this may impact on the National Landscape’s ability to deliver its statutory purpose to conserve and enhance natural beauty. The assessment concludes that there would be significant adverse effects during construction. The assessment of effects during operation (and maintenance) concludes that minor and not significant (adverse) effects would be experienced once the underground cable has been installed and the underground corridor reinstated. Paragraph 2.11.5 sets out the requirement for the Secretary of State to <i>‘have special regard to nationally designated landscapes where the general presumption in favour of overhead lines should be reversed to favour undergrounding’</i>. In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding.

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			Paragraph 2.9.24 of NPS EN-5 sets out the need for the Secretary of State ‘<i>to weigh the feasibility, cost and any harm of the undergrounding or subsea option against:</i> • <i>The adverse implications of the overhead line proposal</i> • <i>The cost and feasibility of re-routeing overhead lines or mitigation proposals for the relevant line section; and</i> • <i>The cost and feasibility of the reconfiguration, rationalisation, and / or use of underground or subsea cabling of proximate existing or proposed electricity networks infrastructure’</i> The Applicant has considered a whole range of different alternatives on the Project, some more theoretical and conceptual, as reported in 7.17 Strategic Options Backcheck and Review [APP-355], 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] and 5.15 Design Development Report [APP-122]. More localised design variants have also been considered.
2.9	Colchester City Council	There are currently no adopted local plan allocations within or close to the Order Limits in Section D. However, the Preferred Options Local Plan for Colchester includes proposed allocations, which carry no weight at this early stage of plan making.	The Applicant has engaged with Colchester City Council through their Regulation 18 Consultation and commented on the interaction between the Project and the emerging allocation PP18: Land North of A120, Marks Tey. The policy description identifies the site has capacity for 1,000 new dwellings but in excess of 10% of the allocation area must be provided as open space. The Norwich to Tilbury Project crosses the proposed allocations with a 400kV overhead line and two new

ID	Stakeholder	Comment	NG response
			pylons in the northern section of the Marks Tey Growth Area. National Grid considers that overhead electricity lines can be successfully co-located with development provided that the statutory safety clearances are maintained in accordance with the Electricity Safety, Quality and Continuity Regulations 2002. National Grid has produced its Design Guidelines for development near high voltage overhead lines, which set out these statutory safety clearances and provide detailed guidance for developers on how successful co-location can be achieved in practice. Accordingly, National Grid does not consider that the Norwich to Tilbury Project would adversely affect the delivery of the proposed site allocations, subject to the future development of those sites having full regard to this guidance. In this context, National Grid recommends that the policies relevant to these allocations explicitly reference the need to comply with both the Electricity Safety, Quality and Continuity Regulations 2002 and National Grid's Design Guidelines for Development Near Pylons and High Voltage Overhead Power Lines, in order to facilitate successful development, should the Norwich to Tilbury Project Development Consent Order be granted.
12.76	Colchester City Council	From Langham, the pylons would continue west through Boxted and towards Great Horkesley. It would go through a more rural part of Boxted village, specifically a 'green gap' between Boxted and Urban Colchester identified in the Boxted Neighbourhood Plan. A specific policy, LC1, in the Boxted	The Applicant notes that this specific Boxted Neighbourhood Plan Policy was not identified within the 8.4.2 Policy Compliance Tracker [REP1-133]. Policy LC1 states that '<i>Developments in Boxted parish which can be demonstrated to be sustainable and which do not materially reduce the green gap between Boxted and urban Colchester will be supported. This</i>

ID	Stakeholder	Comment	NG response
		Neighbourhood Plan seeks to ensure this green gap is not 'materially reduced'.	<i>must reflect the requirements of Policy SB1 in respect of development outside of settlement boundaries'</i> The Project is routed through the Green Gap identified in Figure 5.2 of the Boxted Neighbourhood Plan. The Applicant notes that the objective of the policy is to ensure that the growth of Colchester urban area does not serve to reduce the gap between Colchester and Boxted, thereby eroding Boxted's function as a rural settlement. The proposed pylons constitute permanent vertical structures, they do not amount to settlement growth nor alter the defined edge of settlements. Accordingly, the scheme does not undermine the core objective of preventing coalescence.
15.3.2	Braintree	Within Braintree District, this NSIP would overlap or intersect with several projects at either the construction and/or operational stage. These include major projects such as the Bramford to Twinstead NSIP (PINS reference EN020002) (construction phase), the existing Pelham to Rayleigh 400 kV overhead line (operational phase), the Rivenhall Incinerator (PINS reference EN010013) (construction and operational phases) (Figure A in Appendix 2), and a draft allocation of approximately 5,000 dwellings to the north of Kelvedon, known locally as Kings Dean (Figure B in Appendix 2). For Kings Dean, the proposed line would pass through the northern part of the allocation.	Braintree District Council commenced consultation its Preferred Options (March 2026) Draft Local Plan (Regulation 18) Consultation on 3 March 2026. The Applicant will respond to the consultation noting the interaction between the Project and the proposed Kings Dean allocation. National Grid considers that overhead electricity lines can be successfully co-located with development provided that the statutory safety clearances are maintained in accordance with the Electricity Safety, Quality and Continuity Regulations 2002. National Grid has produced its Design Guidelines for development near high voltage overhead lines, which set out these statutory safety clearances and provide detailed guidance for developers on how successful co-location can be achieved in practice. Accordingly, National Grid does not consider that the Norwich to Tilbury Project would adversely affect the

ID	Stakeholder	Comment	NG response
			delivery of the proposed site allocations, subject to the future development of those sites having full regard to this guidance. In this context, National Grid recommends that the policies relevant to these allocations explicitly reference the need to comply with both the Electricity Safety, Quality and Continuity Regulations 2002 and National Grid's Design Guidelines for Development Near Pylons and High Voltage Overhead Power Lines, in order to facilitate successful development, should the Norwich to Tilbury Project Development Consent Order be granted. With regard to the other Projects listed (Bramford to Twinstead NSIP (PINS reference EN020002) (construction phase), the existing Pelham to Rayleigh 400 kV overhead line (operational phase), the Rivenhall Incinerator) these are addressed in the cumulative assessment.
8.5 to 8.27	Chelmsford City Council	Green Belt	Responded to Land Use- Green Belt section of this document.
7.13	Chelmsford City Council	NPS EN-1 2025 places more emphasis on the clean power 2030 mission and strengthens policy support for transmission and distribution upgrades. This is also echoed in NPS EN-5 2025, labelling upgrades to network transmission infrastructure as critical national priority Projects.	The Applicant notes the reference to Critical National Priority Projects within the LIR (see the Overarching Policy Context section of this document). The Applicant provides a summary of the planning balance in Chapter 8 of the 5.6 Planning Statement [APP-085] in accordance with the NPS EN-1 and EN-5 framework, following a detailed assessment of the Project and its likely effects. Pursuant to paragraph 3.2.7 of NPS EN-1 (2024), substantial weight should be given to the need for energy infrastructure when considering applications for development consent. Paragraph 4.1.3 also sets out a

ID	Stakeholder	Comment	NG response
			presumption in favour of granting consent for energy Nationally Significant Infrastructure Projects (NSIPs). EN-1 further provides that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. The CNP Policies address how residual effects are considered in the planning balance. Given the Project qualifies as CNP Infrastructure, paragraph 3.3.63 of EN-1 confirms the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh the residual effects that remain following application of the mitigation hierarchy as set out in 6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135] and 5.6 Planning Statement [APP-085]. EN-1 paragraph 4.1.7 provides ‘... <i>For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases</i>’. The Applicant considers that the substantial need for the Project is clear and urgent and the mitigation hierarchy has been applied, all in accordance with EN-1 and EN-5. The residual environmental effects identified by Chelmsford City Council fall within the category of non-HRA or non-MCZ impacts where, following the application of the mitigation hierarchy, the further CNP presumption in favour of the Project applies to the planning balance and outweighs such residual effects.

ID	Stakeholder	Comment	NG response
8.33	Chelmsford City Council	Within the Green Wedge, the installation of permanent access routes is a symptom of industrialisation and incursion of the development within sensitive designated areas of the countryside.	As described in the 5.7 Policy Compliance Document [APP-086] the Project will not physically impact on areas identified in the Adopted Chelmsford Local Plan as Green Wedge.
6.4	Brentwood Borough Council	Green Belt	This matter has been responded to in the Land Use-Green Belt section of this report .
5.0	Brentwood Borough Council	Section 5 of the LIR identifies relevant national and local planning policy framework. The LIR notes that in determining a DCO, the Secretary of State (SoS) must have regard to National Planning Statements. In addition, the Secretary of State must have regard to the following: - Any Local Impact Report (Section 104(2)(b) of the PA 2008) - Any matters prescribed (Section 104(2)(c) of the PA 2008) - Any other matters which the SoS thinks are both important and relevant to the SoS decision (Section 104(2)(d) of the PA 2008).	The Applicant notes the policy documents identified by Brentwood Council including NPS EN-1 and EN-5. The Applicant notes that the LIR focuses primarily on local planning policies when appraising environmental topics. The Planning Act 2008 at section 104 (2) (3) states that where a national policy statement has effect, decisions must be made on DCO applications in accordance with any relevant national policy statement unless an exception applies. Consideration as to how the Project has had regard to local planning policy is set out in this Policy Compliance Document [APP-086]. The Applicant also notes that the LIR does not include any reference to the Project being Critical National Priority (see Chapter 2 – Overarching Policy Context section of this document). The Applicant provides a summary of the planning balance in Chapter 8 of the 5.6 Planning Statement [APP-085] in accordance with the NPS EN-1 and EN-5 framework, following a detailed assessment of the Project and its likely effects. Pursuant to paragraph 3.2.7 of NPS EN-1 (2024), substantial weight should be given to the need for energy infrastructure when considering applications for

ID	Stakeholder	Comment	NG response
			development consent. Paragraph 4.1.3 also sets out a presumption in favour of granting consent for energy Nationally Significant Infrastructure Projects (NSIPs). EN-1 further provides that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. The CNP Policies address how residual effects are considered in the planning balance. Given the Project qualifies as CNP Infrastructure, paragraph 3.3.63 of EN-1 confirms the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh the residual effects that remain following application of the mitigation hierarchy as set out in 6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135] and 5.6 Planning Statement [APP-085]. EN-1 paragraph 4.1.7 provides ‘... <i>For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases</i>’. The Applicant considers that the substantial need for the Project is clear and urgent and the mitigation hierarchy has been applied, all in accordance with EN-1 and EN-5. The residual environmental effects identified by Brentwood Borough Council fall within the category of non-HRA or non-MCZ impacts where, following the application of the mitigation hierarchy, the further CNP presumption in favour of the Project applies to the planning balance and outweighs such residual effects.

ID	Stakeholder	Comment	NG response
6.16.11	Thurrock Council	The emerging draft of the Overarching NPS for Energy (EN-1) reinforces the approach taken in the ES. The draft revised EN-1 and EN-5 reiterate the government's commitment to the Clean Power Action Plan 2030, which aims for at least 95% of the UK's electricity generation to come from clean sources by 2030 and emphasises the urgency and critical national priority ("CNP") of developing low-carbon infrastructure, thereby supporting the need case established in the ES.	The Applicant notes the reference to the Critical National Priority of developing low-carbon infrastructure. The Applicant notes that the response may have been drafted in advance of the updated NPS EN-1 coming into force on 6 January 2026. At the point of submission of the Project, the NPSs designated in January 2024 were government policy, the updated NPSs are important and carry weight in the decision-making process.
6.15.1	Thurrock Council	The Council is currently preparing a new Local Plan for Thurrock. This includes identification of sites for new a significant amount of new development over the Plan Period to 2044. Following a call-for-sites and site assessment process, the Council is now finalising the list of sites to be included in the Local Plan as site allocations. As this has not yet drawn to a close it is unable to robustly and publicly provide information about sites being promoted for development that will be included in the Local Plan as Site Allocations. However, it is likely that a small number of sites would be impacted. The most likely impact from the consenting of this scheme for those sites, would be to delay delivery of development in those locations until after construction and return of site being utilised temporarily. The effect of this would be to make it more difficult for the Council to meet its Local Plan housing target within the critical first five years of the plan period. The severity of this impact is currently difficult to quantify at this stage of the Plan Making Process. Once the draft Local Plan has been	The Applicant has engaged with Thurrock Council on the Local Plan Regulation 18 Consultation. The Applicant will continue to engage with Thurrock Council in future Local Plan consultations. The Applicant considers that overhead electricity lines can be successfully co-located with development provided that the statutory safety clearances are maintained in accordance with the Electricity Safety, Quality and Continuity Regulations 2002. National Grid has produced its Design Guidelines for development near high voltage overhead lines, which set out these statutory safety clearances and provide detailed guidance for developers on how successful co-location can be achieved in practice. Accordingly, National Grid does not consider that the Norwich to Tilbury Project would adversely affect the delivery of the proposed site allocations, subject to the future development of those sites having full regard to this guidance. In this context, National Grid recommends that the policies relevant to these allocations explicitly reference the need to comply with both the Electricity Safety, Quality and Continuity

ID	Stakeholder	Comment	NG response
		published for consultation in the spring of 2026, the impact is likely to be clearer.	Regulations 2002 and National Grid's Design Guidelines for Development Near Pylons and High Voltage Overhead Power Lines, in order to facilitate successful development, should the Norwich to Tilbury Project Development Consent Order be granted.

4.3 Environmental Impact Assessment – General

Introduction

- 4.3.1 The Environmental Statement (Volume 6 of the Development Consent Order (DCO) application) provides an assessment of the likely significant effects in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The scope of the assessment was undertaken in accordance with **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]**, by competent experts. The assessments within the Environmental Statement are largely based on industry good practice, recognised guidance or professional judgement based on other similar projects that have been consented.
- 4.3.2 The Applicant has consulted and engaged with statutory consultees and stakeholders since 2022 which has informed the methodology, baseline, mitigation and assessments within the Environmental Statement. Agreements and disagreements with stakeholders are reported in Statements of Common Ground (SoCGs).
- 4.3.3 As identified within the submitted Local Impact Reports, the key areas of ongoing discussion related to the Environmental Impact Assessment in general are the assessment of a worst-case in relation to the Limits of Deviation and clarification of details in relation to waste management during construction. These matters have been responded to through the SoCG process and we will continue to engage with the host authorities to reach further areas of agreement where possible.

Local Authority Positions

- 4.3.4 All Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 4.3 Environmental Impact Assessment – General - Local Impact Report coverage

Local Authority	Paragraphs covering this topic
Norfolk County Council	Sections 6 to 13
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	Sections 4 to 18 (see the table below for detailed responses to paragraphs 9.63, 14.10)
Essex County Council	Sections 4 to 6 (see the table below for detailed responses to paragraphs 5.2.9 – 5.2.11, 6.16.1 - 6.16.3)
Thurrock Council	Section 6 (see the table below for detailed responses to paragraphs 6.11.13, 6.13.26 – 6.13.28, 6.13.31, 6.13.34)
South Norfolk District Council	Sections 3 to 10
Tendring District Council	Sections 8 to 20

Local Authority	Paragraphs covering this topic
	(see the table below for detailed responses to paragraphs 9.8-9.9)
Colchester City Council	Sections 5 to 20 (see the table below for detailed responses to paragraphs 17.1, 20.1)
Braintree District Council	Sections 6 to 15 and 17 (see the table below for detailed responses to paragraphs 16.2.6, 18.1.4)
Chelmsford City Council	Section 8 and Section 9
Brentwood Borough Council	Sections 6 to 8

Responses to New Matters and Applicant Clarifications

- 4.3.5 The table below sets out the Applicant's response to the matters raised in the Local Impact Reports that the Applicant previously has not addressed in their documents, including Statements of Common Ground with Local Authorities or in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**.

Table 4.4 Environmental Impact Assessment - General – Responses to New Matters and Applicant Clarifications

ID	Stakeholder	Comment	NG response
9.63	Suffolk County Council and Babergh and Mid Suffolk District Councils	Prior to decommissioning, an Environmental Impact Assessment should be undertaken to establish the baseline conditions, assess impacts and provide suitable mitigation to result in enhanced biodiversity outcomes.	Requirement 13 within 3.1 Draft Development Consent Order [APP-056] states that <i>‘(1) In the event that, at some future date, the authorised development, or part of it, is to be decommissioned, a written scheme of decommissioning must be submitted to the relevant planning authority for its approval in consultation with the relevant highway authority, at least six months prior to decommissioning works. (2) The approved scheme must be implemented as approved as part of the decommissioning of the authorised development or relevant part of it. (3) This requirement does not apply to the part of the authorised development and associated development described in Schedule 1 (authorised development) which relates to the dismantling and removal of existing infrastructure or apparatus. (4) The written scheme of decommissioning submitted under sub paragraph (1) must include environmental assessment undertaken in accordance with the laws and regulations applicable at the time it is submitted to the relevant planning authority.’</i>
14.10	Suffolk County Council and Babergh and Mid Suffolk District Councils	The relevant paragraphs of the ES which deal with the assessment of each of the pre-commencement operations. (This request is made in the context of paragraph 3.6.7 of the EM which states: “The Environmental Statement does not indicate that the excluded works and operations would be likely to have significant environmental effects. For this reason, National Grid considers that the exclusion of these	The impacts of pre-commencement activities the environmental topic chapters are incorporated into the overall assessment of the Project’s residual effects during construction rather than being assessed under separate sub headings. 3.2 Explanatory Memorandum [APP-057] states that <i>‘The works and operations within the definition of “pre-commencement operations” are either de minimis or have minimal potential for adverse impacts...’</i>

ID	Stakeholder	Comment	NG response
		works and operations from the definition is appropriate”) [APP-057].	
5.2.9 20.1	Essex County Council Colchester City Council	Given the scale and complexity of the project, it may be challenging to keep track of the up-to-date Environmental Statement which will include additional environmental material submitted to a variety of consenting authorities after the dDCO has been approved. The Applicant should make available a central public repository where such additional environmental information will be made available for transparency/clarity.	Appendix A of 1.3 Guide to the Application [REP1-001] provides a master document list and revision history of all submission documents which are available on the Planning Inspectorate’s website.
5.2.10 and 5.2.11 17.1	Essex County Council Colchester City Council	The definition of “maintain” includes a wide range of specified operations in relation to the authorised development, providing that as long as such works do not give rise to any materially new or materially different environmental effects to those identified in the Environmental Statement, these specified operations can take place without further consent. To provide clarity and avoid any dispute, the DCO should incorporate a mechanism for assessing and determining whether such maintenance works give rise to materially new/different environmental effects. As a result, the definition of ‘maintain’ be amended to include “provided such works do not in the opinion of the local planning authority give rise to any materially new or materially different environmental effects to those identified in the Environmental Statement, and any derivative of “maintain” must be construed accordingly.”	As previously noted on page E21 of the Applicant’s Comments on Relevant Representations document, in the context of maintenance, the Applicant would determine whether the proposed maintenance works would give rise to any materially new or materially different environmental effects. This is consistent with the Applicant’s statutory duty to maintain a safe and efficient transmission network.
As6.16.1 to 6.16.3	Essex County Council	Real-Time Environmental Monitoring is currently included in the CoCP. ECC recommends that the	The Applicant has noted the request for publicly accessible real-time monitoring dashboards and will

ID	Stakeholder	Comment	NG response
		CoCP should include live monitoring dashboards for noise, dust / air quality, vibration and EMF (where applicable). This would enable residents to access clear live data thereby maintaining trust and reducing anxiety during the construction process. In respect of Sensitive Receptor Protection Protocol, ECC recommends that the CoCP should list and map: • Schools • Care homes • Health facilities • Disability services • Densely populated residential clusters • High deprivation LSOAs • Communities with high disability prevalence (Figure 10.10) ECC would also recommend that specific mitigation must apply at sensitive receptors (e.g., no night works, noise buffers, early warning systems) to safeguard residential amenity and this requires consideration within the CoCP.	discuss this further with Essex County Council as the Outline Code of Construction Practice is progressed. At this stage, the Applicant considers that the existing 7.2 Outline Code of Construction Practice (Revision B) monitoring framework provides a proportionate and effective means of managing construction effects and ensuring regulatory oversight, consistent with established NSIP practice. A list and map showing receptors listed by Essex County Council in their Local Impact Report [REP1-161] is not considered necessary – these receptors where relevant are already mapped and assessed within relevant environmental topic chapters within the Environmental Statement [APP-123 to APP-287, AS-026 and AS-068]. Mitigation measures identified within 7.2 Outline Code of Construction Practice (Revision B) were identified as part of the Environmental Impact Assessment process and following the mitigation hierarchy. No further mitigation was considered necessary to safeguard residential amenity over those already identified.
16.2.6	Braintree District Council	In this case, the N2T DCO includes an “outline code of construction practice” but does not include a Construction Environmental Management Plan, Materials nor a Waste Management Plan. Clarity should therefore be provided as to which documents will cover the scope of these matters, given their importance in managing the delivery phase of the scheme.	7.2 Outline Code of Construction Practice (Revision B) includes all information and detail that would be typically found within a Construction Environmental Management Plan. An Outline Site Waste Management Plan (which also includes a section on material management) is also provided as 7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan(Revision B).

ID	Stakeholder	Comment	NG response
18.1.4	Braintree District Council	While the Council acknowledges that the Environmental Statement is generally competent in identifying impacts, there remain material uncertainties, gaps in evidence and reliance on post-consent control mechanisms which undermine confidence that the worst-case effects have been fully assessed or can be adequately managed. This is particularly the case where extensive flexibility is afforded through the Limits of Deviation and wide drafting of the Development Consent Order.	The Applicant does not consider there to be any material uncertainties or gaps in evidence within the Environmental Statement [APP-123 to APP-287, AS-026 and AS-068]. The Environmental Statement [APP-123 to APP-287, AS-026 and AS-068] has been prepared in accordance with 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297] and follows good-practice methodologies and regulatory frameworks designed to ensure robust impact assessment. The Environmental Statement [APP-123 to APP-287, AS-026 and AS-068] incorporates comprehensive baseline data and applies assumptions to assess worst-case scenarios. Moreover, post-consent control mechanisms are standard industry practice. The Environmental Statement [APP-123 to APP-287, AS-026 and AS-068] assesses the Limits of Deviation within the 'sensitivity testing' section of each environmental topic chapter. This approach ensures that the Project and all its possible permutations have been assessed.
6.11.13	Thurrock Council	Emissions associated with repair and replacement of assets during the Project lifetime and with operation of infrastructure associated with the Project are considered within the scope of the GHG reduction strategy, as outlined in Table 3.1 of Appendix H to the OCoCP. Section 5.1.4 of the GHG reduction strategy states that GHG calculations would be quantified at the end of each stage of infrastructure delivery (i.e., design stage, construction stage), to monitor emissions and reductions achieved. Whilst operational emissions are scoped into the strategy, it is not clear	7.2 Outline Code of Construction Practice Appendix H - Greenhouse Gas Reduction Strategy [APP-308] includes a decarbonisation tracker; the use stage is covered as part of the tracker (i.e. the operational stage). The owners and key actions would be identified for each opportunity to reduce greenhouse gas emissions throughout the Project life cycle. This enables specific responsibilities to be assigned within the Project's organisational structure. National Grid's overarching decarbonisation commitment is to achieve net zero greenhouse gas

ID	Stakeholder	Comment	NG response
		that they will continue to be monitored and minimised for the lifespan of the infrastructure.	emissions by 2050. This net zero target covers Scope 1 (direct emissions, e.g. fuel consumption on-site), Scope 2 (indirect emissions, e.g. purchased electricity) and Scope 3 (indirect emissions from upstream and downstream, e.g. emissions associated with purchased goods). At a corporate level therefore greenhouse gas emissions are tracked as the asset will become part of the wider energy infrastructure. Opportunities to reduce emissions will also be identified as part of these decarbonisation commitments.
6.13.26 to 6.13.28	Thurrock Council	Waste Management (contractor): - Secure a detailed Site Waste Management Plan ("SWMP") / Resource & Waste Management Plan in line with NPS EN-1 Section 5.15, including: forecast waste arisings; segregation; re-use/recycling targets; licensed carriers; permitted destinations; duty-of-care paperwork; and procedures for hazardous waste and contaminated soils. - Explicitly prohibit disposal of construction/compound wastes through household collections or HWRCs. - Provide sufficient bins/skips within compounds and ensure regular collections to avoid overflow, littering and vermin. Community/place impacts: - Clear advance communications to residents/businesses where traffic management may affect access to bins/collection points.	An Outline Site Waste Management Plan (SWMP) is provided as 7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan (Revision B). This would be developed into the Final SWMP by the Main Works Contractor(s) and submitted to the Local Planning Authorities to discharge Requirement 4 of 3.1 Draft Development Consent Order [APP-056] and would pick up on all points raised apart from the bullet point on fly-tipping. Fly tipping and litter prevention measures are not typically included within a SWMP and would not be included in the Final SWMP.

ID	Stakeholder	Comment	NG response
		- Fly-tipping and litter prevention measures (secure storage, rapid clearance, monitoring of hotspots, enforcement support where appropriate). Governance: - Provide a single point of contact for the waste service and require periodic review/update of waste plans (particularly where programme changes).	
6.13.31	Thurrock Council	Cumulative demand from multiple construction projects on local waste management infrastructure (transfer, treatment and disposal) could lead to longer haul distances, higher carbon emissions and higher costs, unless capacity and logistics are planned and evidenced.	7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan (Revision B) commits the Main Works Contractor(s) to designing out waste wherever possible to reduce what needs to be taken off-site. In addition, 7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan (Revision B) ensures that any company collecting waste from the Project is legally authorised to do so and that it is disposed via a registered carrier to a licensed landfill site, a licensed transfer station, a licensed recycling facility or an exempt site. Cumulative carbon emissions and costs associated with waste would be considered by the Main Works Contractor(s) during construction.
6.13.34	Thurrock Council	In terms of the Outline SWMP/waste appendix: The document should clearly quantify forecast waste arisings (by type), set out the waste hierarchy approach, and identify intended permitted destinations.	The 7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan (Revision B) does not quantify forecast waste arisings, as this would be determined at the detailed design stage, and set out in the Final Site Waste Management Plan.
9.8 and 9.9	Tendring District Council	With the above in mind the ES and CoCP do not adequately explain:	The Applicant will provide appropriate cost recovery for the discharge of DCO requirements by way of a Planning Performance Agreement (PPA) in the same

ID	Stakeholder	Comment	NG response
		- How TDC's monitoring and supervision responsibilities will be resourced, or - How costs associated with enforcement will be supported. TDC seeks clarity and appropriate commitments to ensure that local authorities are not expected to absorb the significant resource burden associated with discharging and enforcing these obligations.	manner as has been carried out so far with the development of the project. We hope to begin these discussions with host authorities before Deadline 3. 7.2 Outline Code of Construction Practice (Revision B) establishes that responsibility for construction management, compliance and day-to-day control rests with the Applicant and its contractors, supported through approved management plans, monitoring and reporting mechanisms secured by the DCO Requirements. The Outline Code of Construction Practice requires monitoring data to be recorded and retained by the Applicant and its contractors as part of the project's environmental management system. Where relevant, this information is to be made available to the local planning authority on request, rather than through routine reporting, enabling authorities to review compliance, investigate issues or follow up complaints as necessary. This approach provides transparency and oversight while maintaining applicant responsibility for monitoring and record-keeping Enforcement, however, is a statutory function exercised independently by local authorities in the public interest and on a discretionary basis, and it is not appropriate for this to be funded by an applicant. 7.2 Outline Code of Construction Practice (Revision B) does not assume that local authorities will undertake routine monitoring on behalf of the Applicant, nor that they will absorb a significant resource burden associated with enforcement. Instead, it provides a proportionate framework intended to minimise the risk of non-compliance through applicant-led controls, with

ID	Stakeholder	Comment	NG response
			enforcement retained as a regulatory backstop consistent with established NSIP practice.

4.4 Land Use (Agriculture and Soils)

Introduction

- 4.4.1 The Agriculture and Soils assessment (**6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]**) has been undertaken in accordance with **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** and is based on industry accepted methodology.
- 4.4.2 Surveys have been undertaken within the Order Limits, with additional auger points located where the Order Limits widen (e.g. in relation to substations). Of the 1,877 proposed auger locations, 1,011 were subject to a detailed Agricultural Land Classification (ALC) survey and the remainder were assessed using a predictive approach. There have been ongoing discussions with Natural England in relation to the approach taken to the surveys, predictive approach and assessment, and in relation to the survey / predicted data which was collected and used to inform the assessment.
- 4.4.3 As identified within the submitted Local Impact Reports, the key areas of disagreement remain around the approach taken to the survey with Local Planning Authorities and the data used to inform the assessment. This will be subject to ongoing engagement. These matters have been responded to through the SoCG and Relevant Representations process with Natural England and Braintree Borough Council, and we will continue to engage with the host authorities to reach further areas of agreement where possible.

Local Authority Positions

- 4.4.4 Eight Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 4.5 Land use (agriculture and soils) – Local Impact Report coverage

Local Authority	LIR Sections covering this topic
Norfolk County Council	N/A
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	Section 5
Essex County Council	Paragraphs 4.4.63 – 4.4.65
Thurrock Council	Paragraphs 6.1.39 – 6.1.40 and Section 6.2
South Norfolk District Council	N/A
Tendring District Council	Section 8 (see the table below for detailed responses to paragraphs 8.17, 8.22, 8.24)
Colchester City Council	Section 5
Braintree District Council	Section 12

Local Authority	LIR Sections covering this topic
	(see the table below for detailed responses to paragraphs 12.4.11, 12.4.12, 12.4.16 – 12.4.18, 12.5.6, 12.6.4)
Chelmsford City Council	Paragraphs 8.486 – 8.489, 8.536, 8.557 – 8.576 (see the table below for the detailed response to paragraph 8.568)
Brentwood Borough Council	Section 6.9 and Section 8.4

Responses to New Matters and Applicant Clarifications

- 4.4.5 The table below sets out the Applicant's response to the matters raised in the Local Impact Reports that the Applicant previously has not addressed in their documents, including Statements of Common Ground with Local Authorities or in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**.

Table 4.6 Land use (agriculture and soils) – responses to new matters and Applicant clarifications

ID	Stakeholder	Comment	NG response
8.568	Chelmsford City Council	NGET has undertaken Agricultural Land Surveying, but noted that only 1011 ha, representing 54% of the proposed survey areas within the Order limits. Predictive and desk-based surveying has been undertaken for the remaining areas. this has taken place at the provisional level. There has been no differentiation between Agricultural Land Grade 3, where 3a is classified as Best and Most Versatile agricultural land.	As presented in 6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [REP1-062] and 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138], predictive Agricultural Land Classification (ALC) grading was undertaken on a 100 m grid (equivalent to approximately one sample point per hectare), and follows the approach of the Welsh Government's (2017) Predictive Agricultural Land Classification Map (Wales) Guidance Note⁵¹, which is in turn based on the published ALC guidelines⁵², differentiating between ALC Grade 3a (Best and Most Versatile land (BMV)) and Grade 3b (non-BMV land). The predictive method adopted has been used to supplement the available Provisional ALC mapping (which is at a scale of 1:250,000 and which is not considered suitable for use at a Project level) to provide a greater level of refinement than using the Provisional ALC 1:250,000 mapping alone. The predictive data also provides the split between Grade 3a and 3b and has been used to support the data

⁵¹ Welsh Government (2017) *Predictive Agricultural Land Classification Map (Wales) Guidance Note*

⁵² Ministry of Agriculture, Fisheries and Food (1988) *Agricultural Land Classification of England and Wales: Revised Guidelines and Criteria for Grading the Quality of Agricultural Land*

ID	Stakeholder	Comment	NG response
			obtained via the ALC surveys and the assessment of effects. During consultation with Natural England (meeting held July 2025), Natural England agreed that the predictive data does fill in the gaps and Natural England considered it was precautionary enough for the Environmental Impact Assessment.
12.4.11	Braintree District Council	The soil type and texture data has been presented as the mapped soil associations with indications as to whether they are present within each of the Project Sections. The accuracy of this mapping data to determine the baseline soil textures is low. It would be better to use surveyed top soil data to provide a more accurate determination of the sensitivity of the soil resource present on site. As the whole study area was not surveyed this information is not available and highlights another limitation of the assessment. However, due to the size of the Order Limits most soil types result in a major significant effect, therefore this is not that critical for the assessment. There are commitments to having the non-surveyed area surveyed pre-construction to ensure this information is available for the soil management plans for each section which is more critical.	The Applicant welcomes the recognition by Braintree District Council that although the whole Study Area was not surveyed, most soil types result in a major significant effect in relation to their sensitivity to handling; therefore, this is not critical for the assessment. Whilst the summary descriptions of soil types are presented in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138], as presented in 6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139] the texture of each horizon at each surveyed point is presented in Annex B1. The predicted texture for topsoil and subsoil for those points not surveyed is presented in Annex B2. As stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] and 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303], a soil survey would be required post-consent / pre-construction in the areas where a detailed Agricultural Land Classification survey was not undertaken, to inform a final Soil Resource Plan and to ensure all relevant site-specific soil information was available.

ID	Stakeholder	Comment	NG response
12.4.12	Braintree District Council	Although additional surveys are being committed to, there are no details on the proposed survey point density. On linear features an approach is often put forward to ensure there is a survey point every 100m and additional points at 50m spacing where there is a change in soil type. This will help to accurately map the soil resources.	As stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] and 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303] , a soil survey would be required post-consent / pre-construction in the areas where a detailed Agricultural Land Classification (ALC) survey was not undertaken, to inform a final Soil Resource Plan. These surveys would be undertaken in accordance with the Soil Survey Field Handbook ⁵³ and the revised ALC guidelines ⁵⁴ , where the survey density would meet the requirement of one auger bore examination per hectare (which for a linear scheme would equate to 1 auger per 100 m) from the ALC guidelines, where practicable. Boundaries between land grades and soil types are determined both from the data and from the surveyor's interpretation of how the landscape changes, and boundaries between soil types would be confirmed through additional points where required.
12.4.16	Braintree District Council	The pits all appear to be relatively shallow compared to the auger borings. It is recognised that a pit does not need to be dug to the full 1.2m and can be stopped once you are 15cm within an SPL, but there are some which do not go deep enough to identify the SPL. For pit 8 for example the SPL is recorded as starting from 55cm, however the pit depth is only 55cm. Without structure and stone data for lower subsoils, droughtiness and wetness limitations	The soil pit information is presented in 6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139] . The soil pits were dug following the auger survey in those locations, and as such the survey team already had a clear understanding of textural horizons from augering data. The augering undertaken provided a good indication of soil horizon changes. For example, once clay subsoil was identified as chalky clay, it was

⁵³ Hodgson, J. M (ed). (2022) *The Soil Survey Handbook. Soil Survey Technical Monograph No.5, Cranfield*

⁵⁴ Department for Environment, Food and Rural Affairs and Welsh Government (2025) *Agricultural Land Classification of England and Wales. Guidelines for grading the quality of agricultural land*

ID	Stakeholder	Comment	NG response
		can be missed. Knowing stone content for this type of temporary development can also be a critical point for landowners when it comes to soil reinstatement, especially if there is potential for stone material to ingress to soil workings.	reasonable to expect that deeper subsoil would also remain clay. This reduced the need for deeper excavation in those locations. In addition, in some locations the soil auger was used to examine deeper subsoil layers below the base of the pit. Where the lower subsoil textures matched those already observed in the upper subsoil, and where features such as gleying or a slowly permeable layer (SPL) were already present, it was expected that deeper layers would exhibit the same or more pronounced characteristics. This supported the decision not to excavate deeper pits. This approach is consistent with methods used by Natural England in their soil classification work for the Natural Capital and Ecosystem Assessment England Ecosystem Survey. Although the survey purpose differs, the underlying methodology for confirming subsoil characteristics is comparable. The auger survey would provide reliable information on both the quantity and types of stones present across different soil types. For example, one of the dominant soils within the scheme area is the Hanslope series, which typically contains chalk and flint.
12.4.17	Braintree District Council	There are also very few samples sent for analysis for the size of the survey and the different soil types and textures surveyed. It would be expected to have a greater proportion of survey points with lab analysis to confirm texture.	As set out in 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303], a total of 37 soil samples were analysed for particle size distribution (PSD) to verify field-based hand texturing. The results confirm a range of textures, including sands, light, medium and heavy loams, clays and occasional medium silts. There are no standard rules governing the proportion of PSD samples required; however, the samples taken cover the

ID	Stakeholder	Comment	NG response
			majority of soil textures expected and reflects the textures of the soil types found within the surveyed area. PSD samples were taken in situations where surveyors were uncertain about the texture during the field assessment. In addition, the survey was led by two experienced and chartered soil scientists. Surveyors routinely crosschecked soil textures with the lead soil scientists, and standard reference texture samples were regularly used to calibrate and refine field texturing.
12.4.18	Braintree District Council	The ALC assessment provides a very high level overview of the climatic, site, soil and interactive limitations. More detailed commentary on the assessment of ALC grade would be expected within an ALC report given the amount of variation in soil types and degree of limitations found across the Order Limits. Splitting the Order Limits into its sections with multiple ALC reports would allow this to be done more easily.	While the main report text in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] presents an overview of the assessment approach and identifies the key constraints, the full dataset is presented in Annex B1 of 6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139] . This provides the full detail on the characteristics and grade limitations at each auger point. The same data from the predictive approach are presented in Annex B2 of 6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139] .
12.5.6	Braintree District Council	The total figure of 3,461ha of agricultural land would mean that the ALC grade for approximately 2,744ha of that land would have been derived from the predictive model (only 1,011ha was surveyed). This is higher than the figure provided within Paragraph 6.4.8 of APP-138 (856ha) for the amount of land that the predicted ALC approach provided. This appears to be misleading as there is no clarification within the assessment of effects sections that states the proportion of land for which the	As presented in 6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139] , the 1,877 auger bore locations were set out at 100 m intervals along the central alignment of the Project, with a plot density of one auger per hectare at wider areas (e.g. substations). These are the locations which were surveyed or where the Agricultural Land Classification (ALC) grade was predicted. These points were set out early in the Project to enable surveys to commence. As part of the

ID	Stakeholder	Comment	NG response
		Predicted ALC approach has been used for. Further review of the approach to mapping the ALC grades for the Order Limits is provided later in the report.	iterative design process, the design was reviewed at a number of points to assess if survey locations needed to be added or changed. These reviews considered what was proposed in each location. For example, in some locations for third-party utility works there would be limited impact (e.g. no soil stripping, short-term access required) and as such surveys were not considered necessary, but the areas were covered by the predictive model. As such, the survey work undertaken focused on the key aspects where there was the greatest potential for impacts. The recognition by Braintree District Council is noted that, although the whole Study Area was not surveyed, most soil types result in a major significant effect; therefore, this is not critical for the assessment.
12.6.4	Braintree District Council	For measure AS02 contained within the CoCP (APP-300): 'Land required temporarily for construction will be returned to its former agricultural use / condition or a use / condition as discussed with the landowner, where practicable'. There is no specific reference to ensure land is returned to its baseline ALC grade. The Outline SRP details what the reinstatement and monitoring requirements should be to ensure land is returned to its former condition. The inclusion of this measure would mean that any land parcel will need to have a pre-construction soil assessment carried out so that the soil condition is known. The use of the predictive ALC grade or baseline data from the desk study would not be suitable.	For areas where surveys were undertaken, as presented in 6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139] , the full soil profile information is presented in Annex B1. This forms a suitable baseline against which reinstatement can be assessed. As stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] and 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303] , a soil survey would be required post-consent / pre-construction in the areas where a detailed Agricultural Land Classification (ALC) survey was not undertaken, to inform a final Soil Resource Plan and to ensure all relevant site-specific soil information was available. This measure would ensure there is sufficient information available as the baseline to inform the assessment of success of

ID	Stakeholder	Comment	NG response
			reinstatement. It has not been proposed to use the predictive data to assess reinstatement success.
8.17	Tendring District Council	TDC's position is clear: these impacts are avoidable, because reasonable and technically viable alternative locations and route strategies exist which would reduce or eliminate harm to BMV land. For this reason, mitigation—however carefully designed—cannot resolve the fundamental conflict created by placing major new transmission infrastructure in the district's only concentration of BMV land -resulting in its permanent loss and potentially more losses in the future.	6.3.A1 Environmental Statement Appendix 3.1 - Our Approach to Options Appraisal [APP-128] sets out the approach taken to the appraisal of options, and notes that a robust and transparent process is used to compare options and to record the positive and negative effects they may have in meeting the defined need, across a wide range of criteria including environmental, socio economic, technical, and cost factors to find a balanced outcome to meeting the identified need while meeting National Grid's statutory duties. As set out in 5.6 Planning Statement [APP-085], it is acknowledged that the Project would result in a loss of Best and Most Versatile (BMV) land and is therefore contrary to National Policy Statement EN-1 (2024) paragraph 5.11.12, as well as the National Planning Policy Framework⁵⁵ and relevant local planning policy. The extent of BMV land across Norfolk, Suffolk and Essex significantly constrains the ability to avoid this particular resource. Within the boundary of Tendring District Council all land within the Order Limits has been confirmed to be BMV land through detailed surveys; however, the majority of land within Tendring District is shown as being Provisionally Grades 1, 2 and 3 and as such specifically within Tendring District opportunities to avoid BMV land will be limited. On balance, 5.6 Planning Statement [APP-085] considers that the significant benefits arising from this

⁵⁵ Ministry of Housing, Communities and Local Government (2024) *National Planning Policy Framework*

ID	Stakeholder	Comment	NG response
			critical national priority infrastructure justify the permanent loss of BMV agricultural land.
8.22	Tendring District Council	Even with best-practice management, soil structural damage can persist for decades, reducing yields, limiting crop choice, and requiring costly long-term remediation.	7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303] sets out the measures which would be implemented to effectively manage the soils which are disturbed and includes a requirement for a Soil Scientist role to ensure the good practice measures (which are based on published guidance) are fully implemented. These measures account for situations where soils may be stockpiled for a number of years and include reconditioning measures to reverse any compaction as a result of handling and stockpiling. 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303] also includes a commitment to an aftercare period to ensure reinstated soils are returned to their previous condition.
8.24	Tendring District Council	Farmers typically own machinery and equipment sized to their existing operational landholding; any reduction in farmable land forces them to sell off essential kit at a further loss. No farmer - big or small can afford to keep equipment and machinery they do not regularly use and that do not provide them with an income. In practice, this means the financial impact is compounded and long lasting, with farmers absorbing major losses through having to engage with the NSIP process, but also from reduced production and from the devaluation of their equipment as well – not the mention the immeasurable mental and physical toll this is having on all affected farmers across the region.	The assessment presented in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] covers the impacts to agricultural landholdings. Once construction is complete all land required temporarily would be returned to landowners and whilst there may be some restrictions to existing activities immediately over or adjacent to buried cables or under overhead lines, these would be dealt with through compensation agreements (which lie outside of the Environmental Impact Assessment process).

4.5 Air Quality and Emissions (Air Quality)

Introduction

- 4.5.1 The Air Quality assessment (**6.7 Environmental Statement Chapter 7 – Air Quality [APP-147]**) has been undertaken in accordance with **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** and is based on relevant industry accepted methodologies.
- 4.5.2 There have been ongoing discussions with stakeholders around construction dust mitigation and routing of construction related traffic. **7.2 Outline Code of Construction Practice [Revision B]** and **7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304]** were issued to the Local Planning Authorities in June 2025 and feedback was incorporated into the submission document.
- 4.5.3 As identified within the submitted Local Impact Reports, the key areas of disagreement remain around the extent and specification of appropriate construction dust mitigation. These matters have been responded to through the SoCG process and we will continue to engage with the host authorities to reach further areas of agreement where possible.

Local Authority Positions

- 4.5.4 Eight Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 4.7 Air Quality and Emissions (Air Quality) - Local Impact Report coverage

Local Authority	LIR sections covering this topic
Norfolk County Council	N/A
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	Sections 12, Section 17 and Table 14 (see the table below for detailed responses to paragraphs 12.73 – 12.74, Table 14: 14e, 14i, 14o, 17.43, 17.68, 17.73, 17.96)
Essex County Council	Paragraphs 4.9.48 – 4.9.49 (see the table below for detailed responses to paragraphs 4.9.48, 4.9.49)
Thurrock Council	Section 6.5 and Section 6.8 (see the table below for detailed responses to paragraphs 6.5.13 - 6.5.17, 6.5.23)
South Norfolk District Council	N/A
Tendring District Council	Section 9 (see the table below for detailed responses to paragraphs 9.3, 9.10)
Colchester City Council	Section 6

Local Authority	LIR sections covering this topic
Braintree District Council	Section 13
Chelmsford City Council	Paragraphs 8.73 – 8.84
Brentwood Borough Council	Paragraphs 6.30 – 6.33, Section 8.3 and Section 10.6 (see the table below for a detailed response to paragraph 6.33)

- 4.5.5 The Applicant has engaged extensively with Local Authorities on matters relating to Air Quality. This is reported in detail in Statements of Common Ground (SoCGs) (see Table 1.1 for Examination Library references). Within the SoCGs, matters are categorised as Agreed, Not Agreed or Under Discussion.
- 4.5.6 Each SoCG includes a table listing each environmental topic chapter in the Environmental Statement. Under each environmental topic chapter subheading, are a list of seven categories which are aligned with how the Environmental Impact Assessment was undertaken.
- 4.5.7 The bullet points below (split by category) provide a summary of where agreements are currently up to with the host Local Authorities relating to Air Quality (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG). Only eight of the twelve Local Authorities' SoCGs contain matters relating to Traffic and Transport.
- Matters relating to EIA – Regulatory, Planning Policy Context and Guidance are under discussion with four out of eight Local Authorities.
 - Matters relating to EIA – Approach and Methods are agreed with five out of eight Local Authorities
 - Matters relating to EIA – Baseline Conditions are under discussion with four out of eight Local Authorities
 - Matters relating to EIA – Embedded, Standard and Additional Mitigation Measures are under discussion with five out of eight Local Authorities
 - Matters relating to EIA – Assessment Conclusions are under discussion with five out of eight Local Authorities
 - Matters relating to **3.1 Draft Development Consent Order [APP-056]**, Outline Management Plans, Mitigation and Monitoring are under discussion with five out of eight Local Authorities.

4.5.8 The table below reflects the category (agreed, not agreed, under discussion) most frequently recorded across the SoCGs for each of the 13 Local Authorities relating to Air Quality (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG).

Image 4.1 Air Quality and Emissions (Air Quality) - Categorisation of Matters in Statements of Common Ground

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Conditions	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring
Norfolk County Council	-	-	-	-	-	-
Suffolk County Council	-	-	-	-	-	-
Essex County Council	-	-	-	-	-	-
Thurrock Council	-	-	-	-	-	-
South Norfolk Council	Agreed	Not agreed	Not agreed	Under discussion	Agreed	Not agreed
Babergh and Mid Suffolk Councils	Agreed	Agreed	Agreed	Agreed	Agreed	Agreed
Tendring District Council	Agreed	Agreed	Agreed	Agreed	Under discussion	Under discussion
Colchester City Council	Agreed	Agreed	Agreed	Agreed	Agreed	Agreed
Braintree City Council	Under discussion	Agreed	Under discussion	Under discussion	Under discussion	Under discussion

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Conditions	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring
Chelmsford City Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion
Brentwood Borough Council	Under discussion	Agreed	Under discussion	Under discussion	Under discussion	Under discussion
Basildon Borough Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion

Responses to New Matters and Applicant Clarifications

- 4.5.9 The table below sets out the Applicant's response to the matters raised in the Local Impact Reports that the Applicant previously has not addressed in their documents, including Statements of Common Ground with Local Authorities or in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**.

Table 4.8 Air Quality and Emissions (Air Quality) – Responses to New Matters and Applicant Clarifications

ID	Stakeholder	Comment	NG response
6.33	Brentwood Borough Council	While the ES sets out the scope of the mitigation measures it is proposing, these do not include any additional mitigation measures beyond embedded and standard, as set out in APP-147 Para 7.6.9. BBC considers that at particularly sensitive areas, such as Haverings Grove, NGET be obliged to engage into robust air quality management, including continuous monitoring at agreed locations, with the view to providing appropriate additional mitigation as agreed	7.2 Outline Code of Construction Practice (Revision B) and 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304] have been prepared to reflect the mitigation measures identified through the construction dust assessment undertaken in 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147] and 6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150] . Dust monitoring and dust suppression are included.

ID	Stakeholder	Comment	NG response
		between NGET and BBC to address any locally identified impacts as they arise.	Both 7.2 Outline Code of Construction Practice (Revision B) and 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304] will be developed into final plans through detailed design by the Main Works Contractor(s). The final version would be submitted for approval in accordance with Requirement 4 of 3.1 Draft Development Consent Order [APP-056] prior to commencement of development. This would include how to address locally identified impacts as they arise.
4.9.48	Essex County Council	The ES Chapter 10 (ES Table 10.4) (APP-192) highlights that air quality impacts arise mainly during construction. The ES states that operational impacts are negligible, and construction impacts minor. It is important to consider that in areas of deprivation and poor health, even temporary reductions in air quality increase respiratory risk, dust and emissions near PRowS, schools and homes disproportionately affect disabled residents and children.	Table 10.5 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] highlights that changes in air quality can disproportionately affect particular vulnerable populations including children, older people and people with pre-existing health conditions and disabilities. It is also noted that people in low-income households have poorer health outcomes as they have less resources available for them to stay healthy. Section 10.7 of 6.10 Environmental Statement Chapter 10- Health and Wellbeing [APP-192] describes potential impacts resulting from a change in air quality from construction activities (for example construction dust) which have the potential to adversely impact the health of local residents. The assessment draws on the findings of the air quality assessment set out in 6.7 Environmental Statement Chapter 7 – Air Quality [APP-147]. This models effects on sensitive receptors, which include homes and social infrastructure such as schools. 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] concludes that although the

ID	Stakeholder	Comment	NG response
			sensitivity of vulnerable population groups, with particular reference to pregnant women, children, older people, those with existing health conditions and those in low-income households, is high, effects are limited to the construction phase of the Project, and any exposure would be small scale and short-term, with minor / negligible effects reported for construction dust, construction traffic and Non-Road Mobile Machinery. With the implementation of standard mitigation measures, the risk to human health arising from construction dust would be low, resulting in a negligible and not significant effect. A range of methods to mitigate potential air quality effects have been proposed within 7.2 Outline Code of Construction Practice (Revision B)
4.9.49	Essex County Council	A mitigation plan should be prepared by the Applicant that considers air quality monitoring with public reporting, dust suppression commitments, avoiding HGV routing past schools or care homes and temporary re-routing of active travel corridors.	7.2 Outline Code of Construction Practice (Revision B) and 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304] have been prepared to reflect the mitigation measures identified through the construction dust assessment undertaken in 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147] and 6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150]. Dust monitoring and dust suppression are included. Versions of 7.2 Outline Code of Construction Practice (Revision B) and 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304] were shared with Essex County Council on 16th May 2025 and the council provided feedback on 4th June 2025. This feedback

ID	Stakeholder	Comment	NG response
			focussed on the use of temporary lay down areas and dust sweeping on the highway network. Construction traffic routeing is considered in 6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271].
9.3	Tendring District Council	The dispersed rural character of this part of the alignment — including Ardleigh, Little Bromley, and the areas around Bentley Road and neighbouring hamlets — means that sensitive receptors are located very close to new haul roads, temporary compounds, and construction laydown areas. While the ES identifies these receptors, TDC emphasises the need for additional site-specific controls where necessary, including tailored monitoring at high-risk locations and rapid, responsive adjustments to Dust Management Plans if emission risks rise due to weather, phasing, or unforeseen activities. Responsibility for continuously monitoring all high-risk locations must rest solely with the Applicant, who should act proactively at all times. Affected residents or businesses must not be burdened with cumbersome procedures if their properties or livelihoods are impacted by any deterioration in air quality.	7.2 Outline Code of Construction Practice (Revision B) and 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304] have been prepared to reflect the mitigation measures identified through the construction dust assessment undertaken in 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147] and 6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150]. Site-specific controls, tailored monitoring at high-risk locations and responses to fugitive dust releases including unforeseen activities would be refined in finalised versions of the Code of Construction Practice and Dust Management Plan. Each of these plans would be developed by the Main Works Contractor(s) and responsibility for any monitoring undertaken would sit with the Main Works Contractor(s). The final versions of these plans would be submitted for approval in accordance with Requirement 4 of 3.1 Draft Development Consent Order [APP-056] prior to commencement of development.
9.10	Tendring District Council	Whilst the requirement for dust and air-quality monitoring is welcomed, TDC expects: • Early (pre-commencement of any construction works) agreement on exact	AQ01 of 7.2 Outline Code of Construction Practice (Revision B) outlines the mechanisms that will manage air quality related agreements on monitoring, feedback and complaints provided for the Project. It

ID	Stakeholder	Comment	NG response
		monitoring locations, equipment specifications, and data-sharing mechanisms; • Provision for TDC to request additional monitoring where risk or complaints increases; • Full access to complaints logs, site inspection records, and exceedance investigations.	also specifies that records of complaints, inspections and investigations be kept and made available to Local Planning Authorities when requested.
6.5.13	Thurrock Council	Whilst the air quality assessment undertaken is generally considered robust in terms of following appropriate policy and guidance and using suitable methodology to undertake modelling, it is of concern that there are only three residential receptors assessed within Section H (Thurrock). These receptors (HR_57, HR_58 and HR_59) are all located adjacent/in close proximity to the stretch of the A13 between the Southfields roundabout and Stanford-le-Hope. Policies PMD1 and PMD9 both specifically refer to the AQMAs within Thurrock, with PMD9 stating that <i>“The Council will only permit the development of new accesses or increased use of existing accesses where: ... vi. Measures are taken to mitigate all adverse air quality impacts in or adjacent to Air Quality Management Areas.”</i>	The Applicant welcomes confirmation that the air quality assessment in 6.7 Environmental Statement Chapter 7 – Air Quality [APP-147] is considered robust. HR_57, HR_58 and HR_59 were chosen as they are considered to be representative of relevant human exposure within the area, that were also likely influenced by changes in emissions to air from road sources for which Project-specific traffic data were available. PMD1 and PMD9 are relevant local policies that have been taken into consideration throughout the assessment. Commitment GG19 of 7.2 Outline Code of Construction Practice (Revision B) is a commitment to use certain Euro standards for different types of vehicle and plant used on the Project, managing the emissions of the limited Project related vehicles that would pass along the A13. This Nationally Significant Infrastructure Project will be tested against Overarching National Policy Statement for Energy (EN-1) (2024) and National Policy Statement for Electricity Networks Infrastructure (EN-5) (2024).
6.5.14	Thurrock Council	It is unclear why the assessment modelling has not included receptors within AQMA No.4 and No.5,	Construction traffic data were supplied for relevant roads along the length of the Project. The nearest road

ID	Stakeholder	Comment	NG response
		despite being identified as key areas of concern which are located within the ARN for the proposed scheme.	to AQMAs No.4 and No.5 for which data were available was the A13 only. As no further traffic data for any of the other roads in the vicinity of these two AQMAs were available, it was considered that any modelling would not be fully representative of the air quality concentrations and therefore they were not included. Modelling receptors using only one single road source where there are multiple emission sources, such as the AQMA, is not good practice. Including the AQMA monitoring locations within the assessment would also not have been appropriate for model verification, due to the same lack of spatially representative traffic data. Since Project-specific traffic data were available for only one road, the A13 at AQMA No.4 and AQMA No.5, no receptors were modelled at these AQMAs. There are similar changes to traffic on the A13 adjacent to receptors HR_57, HR_58 and HR_59 as there are on the A13 at AQMA No.5. At the A13 adjacent to HR_58 and HR_59 the change is predicted to be 252 HGVs and 414 LGVs. At the A13 adjacent to AQMA No.5 there is predicted to be a change of Annual Average Daily HGV flows of 252 and 441 LGV flows. The change in predicted NO₂ concentrations for HR_57, HR_58 and HR_59 was 0.1 µg/m³. This is a negligible impact. As the changes in traffic at both the AQMA No.5 location and the receptors modelled in Thurrock are similar, it is likely the change in concentration at receptors within AQMA No.5 and No.4 would also be negligible.

ID	Stakeholder	Comment	NG response
6.5.15	Thurrock Council	There is further concern that the traffic data used within modelling for the air quality assessment may be based on outdated predictions on assumed construction phase vehicle movements, which brings some uncertainty to the validity of the modelled results in terms of potential air quality impacts.	The construction trip generation methodology was updated between 2024 statutory consultation stage and the submission of the development consent application, due to additional information becoming available from the technical teams. The Applicant has undertaken a robust trip generation and assessment exercise for both the overhead lines and cables and substation construction activities.
6.5.16	Thurrock Council	Further to this, it is identified within ES 'Chapter 7 – Air Quality' (paragraphs 7.9.3 and 7.9.6) that there are potential uncertainties related to other nearby projects, such as the LTC. Despite this, there is no further consideration given within the assessment regarding the potential cumulative effects of additional construction traffic on the ARN of the scheme combined with the significant additional traffic which would be expected (due to proximity) on the same road network during construction and operation of the LTC.	The traffic volumes provided for the assessments presented in 6.16 Environmental Statement Chapter 7 – Air Quality [APP-147] have considered the cumulative effects on the highway network of the combined Project and other committed developments. Coordination and collaboration with the Lower Thames Crossing project is ongoing regarding the combined impact of the projects. If there are changes to the conclusions reported in the Environmental Statement, then these will be reported during examination.
6.5.17	Thurrock Council	In the absence of the key considerations regarding the potential effects of the scheme at sensitive receptors with AQMA No.4 and No.5, and without sufficient information provided regarding the potential cumulative effects in combination with the LTC and other nearby schemes, there is currently insufficient information to demonstrate that the proposals are not in contravention of Thurrock policies PMD1 and PMD9 in terms of air quality. Consequently, based on the insufficient information currently available, the Council cannot rule out further mitigation measures being sought.	The potential negligible impacts at receptors in AQMA No.4 and No.5 are discussed in response to comment ID 6.5.14 above. Committed developments included within the traffic data which have informed the air quality assessments within the Environmental Statement are provided in 6.16.A3 Environmental Statement Appendix 16.3 – Future Baseline [APP-274]. Coordination and collaboration with the Lower Thames Crossing project is ongoing regarding the combined impact of the projects. If there are changes to the

ID	Stakeholder	Comment	NG response
			conclusions reported in the Environmental Statement, then these will be reported during examination. PMD1 and PMD9 are relevant local policies that have been taken into consideration throughout the assessment. This Nationally Significant Infrastructure Project will be tested against Overarching National Policy Statement for Energy (EN-1) (2024) and National Policy Statement for Electricity Networks Infrastructure (EN-5) (2024).
6.5.23	Thurrock Council	The ‘Environmental Impact Assessment Scoping Opinion’ (Document 6.20) included agreement that the decommissioning impacts related to traffic and transport do not need to be included. However, similar considerations should be given to the potential air quality impacts during the decommissioning phase as those detailed for the construction phase (i.e. dust from decommissioning works, decommissioning vehicle emissions).	Section 5.7.15 of 6.19 Scoping Report [APP-296] scoped out a detailed assessment of impacts from decommissioning. Table 4.12 of 6.4 Environmental Statement Chapter 4 – Project Description [APP-130] provides a high-level description of potential effects from decommissioning. It outlines that since decommissioning would occur at least 40 years in the future, it is likely that improvements in vehicle and machinery emissions would reduce the total emissions from the decommissioning process. Dust effects arising from decommissioning would be managed by standard good practice measures applied at the time, therefore effects on air quality are unlikely to be significant. Requirement 13 within 3.1 Draft Development Consent Order [APP-056] states that <i>‘(1) In the event that, at some future date, the authorised development, or part of it, is to be decommissioned, a written scheme of decommissioning must be submitted to the relevant planning authority for its approval in consultation with the relevant highway authority, at least six months prior to decommissioning works. (2)</i>

ID	Stakeholder	Comment	NG response
			<i>The approved scheme must be implemented as approved as part of the decommissioning of the authorised development or relevant part of it. (3) This requirement does not apply to the part of the authorised development and associated development described in Schedule 1 (authorised development) which relates to the dismantling and removal of existing infrastructure or apparatus. (4) The written scheme of decommissioning submitted under sub paragraph (1) must include environmental assessment undertaken in accordance with the laws and regulations applicable at the time it is submitted to the relevant planning authority.'</i>

4.6 Biodiversity, Ecology and Nature Conservation (Ecology and Biodiversity)

Introduction

- 4.6.1 The Ecology and Biodiversity impact assessment has been undertaken in accordance with **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]**. The assessment methodology is also aligned with the Chartered Institute of Ecology and Environmental Management (CIEEM) Ecological Impact Assessment (EclA) guidelines (CIEEM, 2018).
- 4.6.2 The scope and methodology of ecological surveys were developed through professional judgement of perceived impact pathways, good practice guidelines and engagement with statutory and non-statutory stakeholders. A range of ecological surveys have been undertaken across 97% of the Order Limits and for the remaining 3% an assessment has been based on a reasonable worst-case position for a particular ecological feature. Following proposed mitigation measures, which are set out within the **7.4 Outline Landscape and Ecological Management Plan [Revision C]** and the **7.2 Outline Code of Construction Practice [Revision B]**, no significant residual effects on ecological features have been identified. The Project is also proposing a voluntary 10 % Biodiversity Net Gain (BNG), with environmental and societal benefits. **7.4 Outline Landscape and Ecological Management Plan [Revision C]** and **7.2 Outline Code of Construction Practice [Revision B]** were also issued to Local Planning Authorities prior to submission for comment in January 2025 and June 2025. Comments received were incorporated into the submission documents.
- 4.6.3 As identified within the submitted Local Impact Reports, the key areas of disagreement remain around proposed ecological mitigation measures such as appropriate bat roosting mitigation, habitat management and monitoring periods for replacement planting, the role of the Ecological Clerk of Works, the formation of an Ecology Working Group and details of offsite BNG. These matters have been responded to through the SoCG process and we will continue to engage with the host authorities to reach further areas of agreement where possible.

Local Authority Positions

- 4.6.4 All Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 4.9 Biodiversity, Ecology and Nature Conservation (Ecology and Biodiversity) - Local Impact Report coverage

Local Authority	LIR Sections covering this topic
Norfolk County Council	Section 6 (see the table below for detailed responses to paragraphs 6.24)
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	Section 9

Local Authority	LIR Sections covering this topic
	(see the table below for detailed responses to paragraphs 9.34, 9.35, 9.2, 9.5, 9.9, 9.10, 9.42, 9.46, 9.55, 9.59)
Essex County Council	Section 4.12 (see the table below for detailed responses to paragraphs 4.12.22)
Thurrock Council	Section 6.3 (see the table below for detailed responses to paragraphs 6.3.23)
South Norfolk District Council:	Paragraphs 3.1.17 – 3.1.18, Section 8.4 and Section 8.5 (see the table below for detailed responses to paragraphs 8.4.3 – 8.4.5, 8.5.4)
Tendring District Council	Section 20 (see the table below for detailed responses to paragraphs 20.15)
Colchester City Council	Section 4 and Section 7 (see the table below for detailed responses to paragraphs 4.70, 4.71, 7.34)
Braintree District Council	Section 8 (see the table below for detailed responses to paragraphs 8.4.6 – 8.4.10)
Chelmsford City Council	Paragraphs 8.85 – 8.145 (see the table below for detailed responses to paragraphs 8.111 – 8.115)
Brentwood Borough Council	Paragraphs 6.34 – 6.42 (see the table below for detailed responses to paragraphs 6.37, 6.38)

- 4.6.5 The Applicant has engaged extensively with Local Authorities on matters relating to Ecology and Biodiversity. This is reported in detail in Statements of Common Ground (SoCGs) (see Table 1.1 for Examination Library references). Within the SoCGs, matters are categorised as Agreed, Not Agreed or Under Discussion.
- 4.6.6 Each SoCG includes a table listing each environmental topic chapter in the Environmental Statement. Under each environmental topic chapter subheading, are a list of seven categories which are aligned with how the Environmental Impact Assessment was undertaken.
- 4.6.7 The bullet points below (split by category) provide a summary of where agreements are currently up to with the host Local Authorities relating to Ecology and Biodiversity (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG).
- Matters relating to EIA – Regulatory, Planning Policy Context and Guidance are agreed with 10/12 Local Authorities.

- Matters relating to EIA – Approach and Methods are agreed with all Local Authorities
- Matters relating to EIA – Baseline Conditions are agreed with 8/12 Local Authorities
- Matters relating to EIA – Embedded, Standard and Additional Mitigation Measures are agreed with 7/12 Local Authorities
- Matters relating to EIA – Assessment Conclusions are under discussion with 9/12 Local Authorities
- Matters relating to Draft DCO / Outline Management Plans / Mitigation and Monitoring are under discussion with 11/12 Local Authorities
- Other matters relating to Ecology and Biodiversity are under discussion with 11/12 Local Authorities

4.6.8 The table below reflects the category (agreed, under discussion, not agreed), most frequently recorded across the SoCGs for each of the 13 Local Authorities relating to Ecology and Biodiversity (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG).

Image 4.2 Biodiversity, Ecology and Nature Conservation (Ecology and Biodiversity) – Categorisation of Matters in Statements of Common Ground

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Conditions	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring	Other matters as required
Norfolk County Council	Under discussion	Agreed	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion
Suffolk County Council	Agreed	Agreed	Agreed	Under discussion	Under discussion	Under discussion	Under discussion
Essex County Council	Agreed	Agreed	Agreed	Agreed	Under discussion	Under discussion	Under discussion
Thurrock Council	Agreed	Agreed	Agreed	Agreed	Agreed	Agreed	Agreed
South Norfolk Council	Agreed	Agreed	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion
Babergh and Mid Suffolk District Councils	Agreed	Agreed	Agreed	Agreed	Under discussion	Under discussion	Under discussion
Tendring District Council	Agreed	Agreed	Agreed	Agreed	Under discussion	Under discussion	Under discussion

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Conditions	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring	Other matters as required
Colchester City Council	Agreed	Agreed	Agreed	Agreed	Agreed	Under discussion	Under discussion
Braintree District Council	Agreed	Agreed	Under discussion	Agreed	Under discussion	Under discussion	Under discussion
Chelmsford City Council	Agreed	Agreed	Agreed	Under discussion	Under discussion	Under discussion	Under discussion
Brentwood Borough Council	Agreed	Agreed	Agreed	Agreed	Agreed	Under discussion	Under discussion
Basildon Borough Council	Under discussion	Agreed	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion

Responses to New Matters and Applicant Clarifications

- 4.6.9 The table below sets out the Applicant's response to the matters raised in the Local Impact Reports that the Applicant previously has not addressed in their documents, including Statements of Common Ground with Local Authorities or in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**. Where similar matters were raised by multiple Local Authorities, the table provides a single consolidated response to all Local Authorities who raised the matter.

Table 4.10 Biodiversity, Ecology and Nature Conservation (Ecology and Biodiversity) – Responses to New Matters and Applicant Clarifications

ID	Stakeholder	Comment	NG response
6.24	Norfolk County Council	EN-1 requires the applicant to “include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operational phases”. The applicant has not done this in relation to the Meadow Wood ancient wood pasture and will need to provide proposals to do so. NCC would ask that the applicant engage with the landowner and the Norfolk Wildlife Trust in developing deliverable mitigation proposals	‘Meadow Wood ancient woodland pasture’ is not listed as an ancient woodland on the latest Natural England ‘Ancient Woodland Inventory Counties Revised’ update (November 2025). It is assumed based on previous consultation that the Meadow Wood referred to here relates to the non-designated woodland at the Tas Valley. Detailed ecological surveys were undertaken at this area, including detailed woodland habitat surveys and a habitat condition assessment by experienced botanists over appropriate seasons in 2024 and 2025. In addition, a comprehensive arboricultural survey of the trees within the woodland was also undertaken, with particular emphasis on identification of any mature and / or veteran trees in the area. From the results of our surveys, and as presented within the 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026], we acknowledge the woodland in this area is of high ecological value and also classifies as Section 41 priority woodland habitat as listed under the Natural Environment and Rural Communities Act 2006.

ID	Stakeholder Comment	NG response
		However, based on our survey results the woodland as a whole does not meet the criteria to be considered ancient woodland. While there are older / veteran trees present within the woodland, these are focused on the field boundary features and likely remnant of an historic field structure – the location of the veteran trees identified during field surveys are presented within Annex D: Arboricultural Impacts Plan of 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]. Therefore, the routeing decisions for this area do not trigger the ancient woodland specific considerations in National Policy Statement EN-1 (2024). It would be necessary to undertake some tree removal within the woodland to provide clearance for the overhead line, but this would be limited to only the amount of tree cover necessary to meet safe electrical clearance requirements. Typically, tree removal is potentially required close to the alignment (20 m to either side of the centreline) with canopy management (rather than tree removal) for a further 8 m beyond the 20 m. In addition to 7.20 2023 - Design Development Report for the Project [APP-358], 7.21 2024 - Design Development Report for the Project [APP-359] and 5.15 Design Development Report [APP-122], further information can be found on Sheet 8 of 13 in 2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section A [APP-048] and 5.1 Consultation Report [APP-066].

ID	Stakeholder Comment		NG response
			The impact on the woodland would be mitigated through replacement tree planting within the Order Limits, where practicable. In addition, the woodland impact would be captured within the Biodiversity Net Gain (BNG) metric to ensure a sufficient multiplier is applied for woodlands and any deficit would be delivered off-site following the approach set out within 7.1 Biodiversity Net Gain Report [APP-299]. Impacts on specific veteran trees within the woodland would be subject to compensation, following measures outlined within 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]. The Applicant will engage with the landowner and Norfolk Wildlife Trust as detailed design progresses.
8.4.6 - 8.4.10	Braintree District Council	Where static bat detector surveys within the Order Limits recorded barbastelle bat activity above a defined threshold, robust roost survey methods were employed, including aerial inspections, dusk emergence	The bat roost survey scope was agreed with Natural England, as evidenced within 5.9.13 Draft Statement of Common Ground - Natural England [REP1-034], as the primary statutory advisor and competent authority on roosting bats. The Applicant disagrees that this is a flawed approach to bat surveys. Ground level tree assessments to identify potential bat roosting features have been undertaken on 97% of the land within the Order Limits, giving a detailed understanding of the natural potential roost resource. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] includes a reasonable worst-case assessment of impacts on potential roost features.
9.34 – 9.35	Suffolk County Council and Babergh & Mid-Suffolk	surveys, backtracking surveys, and radio-tracking. However, this level of tree roost survey was only undertaken at 12 discrete locations, which covers only a fraction of the overall potential for bat roost tree impacts bookmark:// bookmark36/ across the route.	
4.70 - 4.71	Colchester City Council	This survey deficit appears to be justified by the supposition that: (1) barbastelle are a more important conservation concern than other bat species (despite the roosts of other species having equivalent legal protection); and (2) simply going through the Natural England bat mitigation licensing process wherever it is	
4.12.22	Essex County Council		

ID	Stakeholder	Comment	NG response
8.111-8.115	Chelmsford City Council	found to be needed will ultimately and inevitably result in a neutral or positive impact outcome. The Council regard this as a flawed approach, lacking evidence to support it. Impacts on all protected bat species need to be assessed with reasonable confidence and the proposed mitigation considered appropriate, prior to determination, to support a lawful decision. If a greater level of roost tree survey is not feasible prior to consideration of the DCO by the ExA, the Council consider an evidence-based aggressive estimation of the percentage of PRF-M (Preliminary Roost Features - potential) trees that evidently (or very likely) support a significant level of bat roosting, should be submitted prior to determination. In addition, the Council consider that the design of a more confidently proportionate bat tree roost mitigation/compensation scheme is required, prior to determination.	Barbastelle are listed as 'vulnerable' and are a very rare species in England, restricted mainly to southern and central England and Wales. Other bat species recorded within the survey area are not as rare and are more widespread across the country. While all roosts are afforded the same protection, the impact on a barbastelle roost holds greater significance due to the rarity and geographical restriction of the species. Barbastelle are also listed as Annex II species under the EU Habitats Directive meaning that they are of community interest and require special conservation measures, demonstrating further the significance of this species. Given the above, further targeted surveys have been undertaken at key locations to confirm whether any bat species (but with a focus on barbastelle) are roosting in trees affected by the Project. These further targeted surveys included aerial surveys, emergence, back-tracking and radio tracking. Where roosts have been confirmed the route was amended to avoid impacts. Due to the transient nature of bat tree roosts, pre-construction surveys would be undertaken of all trees due to be lost with suitability to be used by roosting bats, to confirm the presence/absence of roosting bats, prior to felling/pruning. Where the presence of a roost is confirmed, mitigation measures, as agreed with Natural England, would be delivered under licence to ensure no impact on the favourable conservation of bats. A draft Project-wide bat licence has been prepared through consultation with Natural England where likely impacts and appropriate mitigation measures for

ID	Stakeholder Comment	NG response
		each different species and roost type likely to be encountered are given. The draft Project-wide licence has been prepared where likely impacts have been assessed and a percentage of all trees with PRFs likely to support roosting bats has been agreed with Natural England. The draft Project-wide licence sets out appropriate mitigation measures for each different species and roost type likely to be encountered and includes measures such as provision of bat boxes and tree veternatisation. Natural England has been consulted throughout the survey design and development of the mitigation approach as presented within the draft licence and are in support of the approach. A letter of support is expected to be issued by Natural England supporting the contents of the draft Project-wide licence during the Examination.
8.4.3	South Norfolk District Council Construction within close proximity to watercourses hydrologically linked to designated sites presents significant risk. Pylon RG24 and haul routes lie within 30–50 metres of watercourses draining into the SAC.	The assessment of potential impacts on the Norfolk Valley Fens Special Area of Conservation (SAC) forms part of the 5.3 Habitats Regulations Assessment Report [APP-082], which concludes no adverse effects on the integrity of the Norfolk Valley Fens SAC following an Appropriate Assessment. The conclusions of the 5.3 Habitats Regulations Assessment Report [APP-082] have been accepted by Natural England as evidenced in 5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]. All associated mitigation is secured through the 7.4 Outline Landscape and Ecological Management Plan (Revision C) and 7.2 Outline Code of Construction Practice (Revision B). Compliance with the final versions of these documents is also

ID	Stakeholder Comment	NG response
		required by Requirement 4 of 3.1 Draft Development Consent Order [APP-056]. Mitigation measures are also included within 7.2 Outline Code of Construction Practice (Revision B) specifically relating to hydrology, land drainage and flood risk that will ensure any potential hydrological impacts on the SAC are mitigated for.
8.4.4	South Norfolk District Council The Council notes that reliance on compensation at Roydon Fen is not justified: alternatives and avoidance measures have not been sufficiently explored.	A full ecological impact assessment of Roydon Fen Local Nature Reserve (LNR) has been undertaken and presented within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. The assessment identifies, in the absence of mitigation, potential hydrological changes which may degrade habitats and associated groundwater dependent terrestrial ecosystems at Roydon Fen LNR. However, standard pollution prevention mitigation measures set out within commitment GG32 of the 7.2 Outline Code of Construction Practice (Revision B) are proposed to ensure no residual effects on the LNR are encountered. No compensation measures have been identified or are deemed necessary at Roydon Fen. This approach is compliant with the mitigation hierarchy.
8.4.5	South Norfolk District Council Pink-footed Geese may be affected by vegetation removal and construction during winter grazing periods. A species management plan will be required.	The wintering bird survey scope was agreed with Natural England, as evidenced within 5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.8.A8 Environmental Statement Appendix 8.8 – Wintering and Passage Bird Report [APP-167 to

ID	Stakeholder Comment	NG response
		APP-170] details wintering bird survey results, potential impact pathways and mitigation measures in relation to wintering birds. Three wintering bird vantage point (VP) survey locations were selected in Norfolk, focussing on potential wintering bird flight corridors along the River Tas, a tributary of the River Tas, and the River Waveney. The VPs also included fields, water bodies and wetland areas associated with these watercourses. These areas were considered to offer the highest potential for wintering waterbirds following a desk-based habitat review. No pink-footed geese were recorded during the survey effort at these locations. In addition, following a comprehensive desk study, just three records of pink-footed geese were returned for a 10-year period (2013–2022) within a 2 km buffer along the entirety of the Norwich to Tilbury route. Therefore, pink-footed geese are not considered to be impacted by the Project. Temporary habitat loss as a result of the construction works would be reinstated in line with 7.4 Outline Landscape and Ecological Management Plan (Revision C). In addition, standard mitigation measures relating to wintering birds will be secured through the 7.2 Outline Code of Construction Practice (Revision B).
8.5.4	South Norfolk District Council Ecological Cumulative Effects: Multiple projects increase pressure on habitats, hydrological systems and species, with overlapping works create a risk of incremental degradation.	The Applicant has undertaken a detailed cumulative assessment. 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] contains the assessment of cumulative effects with respect to other developments on ecological

ID	Stakeholder	Comment	NG response
			receptors and does not identify any significant cumulative effects on ecological receptors.
20.15	Tendring District Council	TDC notes that the failure to properly identify trees and hedgerow assets has direct consequences for biodiversity impact assessment. Baseline errors undermine the calculation of: • habitat loss, • functional ecological connectivity, • seasonal/sheltering habitat impacts, • bird/bat collision risk modelling, • and BNG calculations.	The Applicant does not agree that there are baseline errors in the habitat data used to assess habitat loss, functional ecological connectivity, seasonal/sheltering habitat impacts, bat/bird collision risk modelling and Biodiversity Net Gain (BNG). Habitat surveys were undertaken by competent ecological professionals, in accordance with the BNG habitat definitions and condition guidelines⁵⁶. Following the completion of additional habitat surveys over 2025, the completed survey area is now 97% of the Order Limits. The remaining 3% has been mapped from detailed aerial imagery and average habitat condition scores applied. This approach has been discussed and agreed in principle with Natural England. This baseline habitat information is set out within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 7.1 Biodiversity Net Gain Report [APP-299].
9.2	Suffolk County Council and Barbergh & Mid-Suffolk	Whilst it is considered suboptimal that 3% of the DCO has not been subject to direct survey and therefore entirely accurate impact assessment, it is considered likely that the presumptive impact assessment and precautionary approach will suffice to ensure no significant impacts. However, detailed location plans and description of how assessments were made (in lieu of site survey) of all sections, should be provided to provide confidence in this approach.	Following the completion of additional habitat surveys over 2025, the completed survey area is now 97% of the Order Limits. The remaining 3% has been mapped from detailed aerial imagery (fixed wing drone survey) and average habitat condition scores applied. This approach has been discussed and agreed in principle with Natural England and the justification of this approach is set out within the 7.1 Biodiversity Net Gain Report

⁵⁶ Department for Environment, Food and Rural Affairs (2025) *Statutory Biodiversity Metric Condition Assessments – July 2025*

ID	Stakeholder Comment	NG response
		[APP-299]. Although surveys did not cover 100% of the Order Limits, this is not uncommon for projects of this scale; the 97% survey coverage achieved is considered more than sufficient to undertake an accurate assessment of the ecological impacts of the Project as presented within 6.8 Environmental Statement Chapter 8 -Ecology and Biodiversity [AS-026]. Assumptions on the remaining 3% are also presented within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. The Applicant disagrees that further detail is needed on the remaining 3% of land within the Order Limits.
9.5	Suffolk County Council and Barbergh & Mid-Suffolk Also, additional mitigation should be designed as required in the specific case of reptiles within a “Key reptile site” at Sproughton Park County Wildlife Site (“CWS”), to ensure incidental impacts upon the site’s functionality is not impacted during construction.	The Applicant disagrees that additional mitigation is required over and above what is already proposed within the 7.4 Outline Landscape and Ecological Management Plan (Revision C) for reptiles at Sproughton Park County Wildlife Site (CWS). The proposed works within Sproughton Park CWS and other ‘key reptile sites’ would be micro-sited to avoid impacts on ecologically important features including those for reptiles. This commitment is set out within Section 7 of the 7.4 Outline Landscape and Ecological Management Plan (Revision C). In addition, Section 6 of 7.4 Outline Landscape and Ecological Management Plan(Revision C) sets out the requirements for creation of hibernacula into areas outside the works areas, to ensure no net loss of these hibernation features, during the short term, for the local reptile population. These measures would ensure the functionality of the key reptile sites, including

ID	Stakeholder Comment		NG response
			Sproughton Park CWS, are maintained during construction.
9.9	Suffolk County Council and Barbergh & Mid-Suffolk	The consideration that construction works are temporary and therefore in some cases long-term impacts would be negligible. It is considered however that this may overlook significant short/medium term impacts on certain habitats and species (e.g. bat foraging and commuting) through isolation and separation of habitats. Whilst this connectivity may well be reinstated through the proposed mitigation, if populations are significantly impacted in the intervening period, the future quality of the habitat may prove moot.	Severance and fragmentation impacts have been assessed, where relevant for a particular protected species, within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] . Where severance or fragmentation potential effects were identified, mitigation measures have been proposed as set out within Section 6 of the 7.4 Outline Landscape and Ecological Management Plan(Revision C) . This includes the use of artificial bat flyways during construction to maintain connectivity and the design of bridges/culverts to ensure no impact on aquatic invertebrates and riparian mammals as agreed with the Environment Agency. These severance / fragmentation mitigation measures would be implemented during construction, to ensure no detrimental impact on the associated ecological feature in the short term.
9.10	Suffolk County Council and Barbergh & Mid-Suffolk	An Ecology Working Group should be formed to oversee, receive progress reports and advise on unforeseen issues for the entire project prior to pre-commencement works taking place and throughout the construction phase and monitoring periods as stipulated within the LEMP and HMMP.	The Applicant acknowledges the large scale and complexity of the Project and sees the value in setting up an Ecology Working Group for the construction phase. This Ecology Working Group would be formed post-consent to provide progress updates on ecological mitigation, as set out within 7.4 Outline Landscape and Ecological Management Plan (Revision C) and 7.2 Outline Code of Construction Practice (Revision B) during the construction period. The Ecology Working Group would include the Ecological Clerk of Works and suitably qualified and experienced members from the Local Planning Authorities,

ID	Stakeholder Comment	NG response
		Wildlife Trust/s and Natural England on their request and agreement with the Applicant. The next iteration of the Outline Landscape and Ecological Management Plan will be updated to include the requirement for a post-consent Ecology Working Group.
9.42	Suffolk County Council and Barbergh & Mid-Suffolk	The BNG report [APP-299] has not been updated to incorporate the results of the additional results of the update habitat survey [AS-028]. These will likely alter the results of the most recent BNG metric and must be amended. 7.1 Biodiversity Net Gain Report [APP-299] provides an indicative Biodiversity Net Gain (BNG) assessment, based on information known at the time of submission. This included baseline data as of the end of May 2025, with 87.5% of the site being subject to detailed habitat surveys and the remaining 12.5% being mapped from detailed aerial imagery (fixed-wing drone survey). This approach has been discussed and agreed in principle with Natural England. Post-consent the baseline habitat information would be updated, and the Project would be subject to detailed design. The BNG metric would be re-run with the updated baseline and refined impact assessment and any BNG deficit (that cannot be delivered within the Order Limits) would be delivered off-site in line with the approach already set out within 7.1 Biodiversity Net Gain Report [APP-299]. The Project has committed to delivering 10% BNG with environmental and societal benefits.
9.46	Suffolk County Council and Barbergh & Mid-Suffolk	Impacts on future populations of birds associated with WaLOR: these have been duly considered within the ES and proposed mitigation for future bird populations in particular (i.e. bird deflectors and spacers on the wires) have been identified and proposed. These are welcome although the efficacy of these measures will need to be demonstrated through appropriate As detailed within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.8.A8 Environmental Statement Appendix 8.8 – Wintering and Passage Bird Report [APP-167 to APP-170], although notable collision risk was not identified during baseline surveys at the

ID	Stakeholder	Comment	NG response
		monitoring of the area where they are located. Such monitoring can be discussed and detailed by the Ecology Working Group.	River Waveney, potential operational impacts on future wintering and passage birds as a result of the Waveney and Little Ouse Recovery (WaLOR) project have been assessed. Bird collision was identified as a potential future impact, and as such, mitigation in the form of orange spacers and bird diverters on the earth wire are proposed at the River Waveney on a precautionary basis. As a result, no significant residual effects are predicted. This mitigation is secured within 7.4 Outline Landscape and Ecological Management Plan (Revision C) . This mitigation therefore offers two options for diverting bird flights (coloured spacers and diverters) and the design is considered appropriate for the pylon type and habitats / likely species present. This is in accordance with National Policy Statement EN-5 (2024). This mitigation addresses the source of collision risk rather than relying on any post construction validation or monitoring. As a result, the Applicant considers that the proposed mitigation is already sufficient to reduce collision risk to non-significant levels, and no operational monitoring is required.
9.55	Suffolk County Council and Barbergh & Mid-Suffolk	The ECoW arrangement should be detailed with regard to: remit, resourcing, enforcement powers and numbers and presented to the Ecology Working Group for acceptance that it is considered likely to be fit for purpose, or subject to negotiation. The specifications of the ECoW for the entire scheme should be detailed and approved and guaranteed through appropriate mechanisms prior to any pre-commencement works taking place.	The Project role and responsibilities of the various clerk of works, environmental managers, work supervisors and technical specialists are set out within Table 3.1 of 7.4 Outline Landscape and Ecological Management Plan (Revision C) . The various Ecological Clerk of Works (ECoW) would be suitably qualified based on industry good practice. These roles would be delivered by multiple individuals across the Project, depending on the specific requirement/task. Further detail on the

ID	Stakeholder Comment	NG response
		multiple specific individuals undertaking these roles would be available post-consent as part of the final Landscape and Ecological Management Plan/s.
9.59	Suffolk County Council and Barbergh & Mid-Suffolk Suitable mitigation for breeding birds should be detailed, so as to result in negligible impacts upon the receptor, not using the Environment Areas as replacement or enhanced habitat where these habitats form part of BNG calculations. I.e. mitigation for breeding birds should be additional to BNG not an incidental result of BNG.	The Applicant can confirm that no habitat creation or enhancement is proposed specifically for breeding or wintering/passage birds within the Environmental Areas. The reference in Table 8.23 of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] to habitat creation/enhancement associated with Biodiversity Net Gain (BNG), relates solely to the measures proposed to address permanent habitat loss at the Project level. It is not relied upon as mitigation for breeding birds or wintering/passage birds; however, it will provide additional beneficial effects overall to breeding birds. Mitigation for breeding / wintering birds is provided through established construction phase measures and habitat reinstatement, as set out in 7.4 Outline Landscape and Ecological Management Plan (Revision C). These include seasonal timing of vegetation removal, pre-works nesting bird checks, exclusion zones around active nests, reinstatement of temporarily lost habitat, and measures to minimise disturbance. These measures operate independently of BNG and ensure that impacts on breeding and wintering/passage birds are avoided or reduced at source. BNG is intended to deliver a net gain in biodiversity value across the Project. The assessment of effects on breeding and wintering/passage birds does not depend on BNG to demonstrate that no significant

ID	Stakeholder Comment	NG response
		residual effects remain. Accordingly, no separate mitigation/compensation area is required to address permanent habitat loss for breeding or wintering/passage birds, as the assessment concludes that such losses do not give rise to significant residual effects.
Table 10 - 10b	Suffolk County Council and Barbergh & Mid-Suffolk	Permanent or temporary loss of vegetation for highway access. LEMP. Use of coppicing / cutting rather than removal.
		The Applicant can confirm that where hedgerow removal/management is required to facilitate visibility splays at highway accesses, the amount of hedgerow removal will be reduced as much as possible and instead the hedgerow will be cut to stump. This will allow sufficient visibility to ensure safety measures while allowing the hedgerow to grow back on completion of works. The commitment is already outlined within Section 8 of the 7.4 Outline Landscape and Ecological Management Plan (Revision C) .
6.3.23	Thurrock Council	Rainbow Shaw is an ancient woodland which is due to be directly impacted by the construction of the LTC. A package of mitigation/compensation measures, including new woodland planting, had been outlined in that project OLEMP. There is however overlap with areas required for mitigation/compensation associated with the Tilbury North Substation. It is essential that there is no overall reduction in the amount of mitigation delivered in this location for the two schemes. It is essential that this be dealt with at detailed design and set out in the final LEMP.
		The Applicant is aware of the interaction with the Lower Thames Crossing (LTC) project environmental mitigation/compensation around Tilbury North Substation. The Project's Order Limits allow sufficient space for alternative ancient woodland and nitrogen deposition mitigation/compensation planting, close to the areas originally proposed by the LTC project. The Applicant is working closely with the LTC project team to ensure both projects can be successfully delivered, including the existing environmental mitigation/compensation obligations within the LTC Development Consent Order. Full details on the status of these ongoing discussions, can be found

ID	Stakeholder Comment	NG response
		within 8.3.4 Draft Statement of Common Ground – Lower Thames Crossing [REP1-075] .
6.37	Brentwood Borough Council For the purposes of understanding appropriate mitigation for the impacts of the proposal, BBC considers that as complete as possible ecological assessment surveys of the affected receptors for this thematic area should have been finalised in advance of dDCO submission. However, in establishing impact mitigation there has been a reliance on incomplete surveys and a focus on post-consent mitigation, creating uncertainty about the potential full scale of impacts on protected species and priority habitats as well as the most suitable mitigation for them and extent of it required at this stage. BBC does not consider this acceptable, as any lack of success of a habitat reestablishment, or underestimate of impacts, or misidentification of appropriate mitigation would lead to more harm than originally expected and a weakening of any proposed mitigation measures.	Additional survey results from 2025 (including otter, water vole and bat roost inspections) are presented within the updated version of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] which was submitted to the Planning Inspectorate in November 2025. The provision of this additional data does not change the conclusions of the assessment submitted in August 2025. All ecological impacts on habitats and protected species have been assessed in full within 6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [APP-158].
6.38	Brentwood Borough Council In addition to the above, NPS EN-1 also sets out in the same paragraph that the Applicant should demonstrate that “the timing of construction has been planned to avoid or limit disturbance”. Whilst this may primarily refer to the phasing of the project to accommodate ecological and/or natural environment requirements, BBC considers it is equally relevant in the context of the extended working hours being proposed over the four-year construction schedule. As addressed in the Noise & Vibration section below, these extended working hours will not only cause noise, health and wellbeing effects on human receptors within their proximity, but will have similar and significant negative impacts on local wildlife and ecological receptors in proximity to the proposed works.	The Applicant has assessed potential noise and vibration effects on ecological receptors within the 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. This includes potential noise and vibration effects on nocturnal and crepuscular species, as a result of extended working hours. No significant residual effects were identified on ecological receptors as a result of the extended working hours.

ID	Stakeholder	Comment	NG response
7.34	Colchester City Council	The overhead lines will cross through landscapes used as bird migratory routes. EN-5 notes the impact that overhead lines may have on birds coming into contact with the electrified lines.	Collision risk has been assessed within 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 for Ornithology, Royal Society for the Protection of Birds and local records centres, resulting in over 26,000 bird records, across a lengthy species list. NatureScot (2016 ⁵⁷) guidance was used to determine Target Species and Secondary Species with regard to collision risk, 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 corridors that are used by birds during migration or when moving between habitats along the estuaries / coast and inland, or cause mortality along such routes. The assessment did not identify locations which pose notable collision concern. 5.3 Habitats Regulations Assessment Report [APP-082] concluded there would be no adverse effects on the integrity of European Sites within the Impact Risk Zone of the project, including Special Protection Areas and Ramsar sites along the east coast which are designated for passage and wintering birds. The conclusions of 5.3 Habitats Regulations Assessment Report [APP-

⁵⁷ NatureScot (2016) *Guidance – Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds*

ID	Stakeholder Comment	NG response
		082] have been accepted by Natural England as evidenced within 5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]. 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 (Revision C). This approach and assessment demonstrate compliance with National Policy Statement EN-5 (2024) as the potential for collision has been robustly evaluated and addressed through design stage assessment and targeted survey effort.

4.7 Contaminated Land, Geology and Hydrogeology

Introduction

- 4.7.1 The Contaminated Land, Geology and Hydrogeology assessment (**6.9 Environmental Statement Chapter 9 - Contaminated Land, Geology and Hydrogeology [APP-181]**) has been undertaken in accordance with the **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** and in line with national and local policy, and industry guidance. Assessments have been scoped through engaging with the Environment Agency (EA) and have been informed by a range of data sources as presented in the Scoping Report, including data from local authorities.
- 4.7.2 A Preliminary Contamination Risk Assessment (**6.9.A1 Environmental Statement Appendix 9.1 - Baseline Information and Preliminary Contamination Risk Assessment [APP-182]**), a Qualitative Minerals Resource and Infrastructure Assessment (**6.9.A2 Environmental Statement Appendix 9.2 - Qualitative Minerals Resource and Infrastructure Assessment [APP-183]**) and a Qualitative Groundwater Risk Assessment (**6.9.A3 Environmental Statement Appendix 9.3 - Groundwater Baseline and Qualitative Groundwater Risk Assessment [APP-184]**) have been undertaken for the land within the Study Area. The methodology and scope of the assessment and the mitigation have been reviewed by the EA and the Local Planning Authorities, and discussed in both thematic meetings and in relation to the Relevant Representations. These matters have been responded to through the SoCG process and we will continue to engage with the host authorities to reach further areas of agreement where possible.

Local Authority Positions

- 4.7.3 Nine Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 4.11 Contaminated Land, Geology and Hydrogeology - Local Impact Report coverage

Local Authority	LIR sections covering this topic
Norfolk County Council	Section 7
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	Section 5 and Section 15 (see the table below for detailed responses to paragraphs 15.4)
Essex County Council	Section 4.6
Thurrock Council	Section 6.13 and Appendix A (see the table below for detailed responses to Appendix A)
South Norfolk District Council:	Section 9, Section 10 and Section 11 (see the table below for detailed responses to paragraphs 9.5.1, 10.7.1, 11.3.1)
Tendring District Council	Section 11

Local Authority	LIR sections covering this topic
Colchester City Council	Section 8
Braintree District Council	Section 11 and Section 12
Chelmsford City Council	Paragraphs 8.577 – 8.579
Brentwood Borough Council	N/A

- 4.7.4** The Applicant has engaged extensively with Local Authorities on matters relating to Contaminated Land, Geology and Hydrogeology. This is reported in detail in Statements of Common Ground (SoCGs) (see Table 1.1 for Examination Library references). Within the SoCGs, matters are categorised as Agreed, Not Agreed or Under Discussion.
- 4.7.5** Each SoCG includes a table listing each environmental topic chapter in the Environmental Statement. Under each environmental topic chapter subheading, are a list of seven categories which are aligned with how the Environmental Impact Assessment was undertaken.
- 4.7.6** The bullet points below (split by category) provide a summary of where agreements are currently up to with the host Local Authorities relating to Contaminated Land, Geology and Hydrogeology (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG). Only five of the twelve Local Authorities' SoCGs contain matters relating to Contaminated Land, Geology and Hydrogeology.
- Matters relating to EIA – Regulatory, Planning Policy Context and Guidance are under discussion with 3/5 Local Authorities.
 - Matters relating to EIA – Approach and Methods are agreed with 4/5 Local Authorities
 - Matters relating to EIA – Baseline Conditions are agreed with 3/5 Local Authorities
 - Matters relating to EIA – Embedded, Standard and Additional Mitigation Measures are under discussion with 2/5 Local Authorities.
 - Matters relating to EIA – Assessment Conclusions are under discussion with 4/5 Local Authorities
 - Matters relating to Draft DCO / Outline Management Plans / Mitigation and Monitoring are under discussion with 4/5 Local Authorities

4.7.7 The table below reflects the category (agreed, under discussion, not agreed), most frequently recorded across the SoCGs for each of the 13 Local Authorities relating to Contaminated Land, Geology and Hydrogeology (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG).

Image 4.3 Contaminated Land, Geology and Hydrogeology - Categorisation of Matters in Statements of Common Ground

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Conditions	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring	Other matters as required
Norfolk County Council	Under discussion	Agreed	Agreed	N/A	Agreed	Agreed	Under discussion
Suffolk County Council	Under discussion	Agreed	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion
Essex County Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	-
Thurrock County Council	Agreed	Agreed	Agreed	Agreed	Under discussion	Under discussion	-
South Norfolk Council	-	-	-	-	-	-	-
Babergh and Mid Suffolk Councils	-	-	-	-	-	-	-
Tendring District Council	-	-	-	-	-	-	-
Colchester City Council	-	-	-	-	-	-	-

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Conditions	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring	Other matters as required
Braintree District Council	Agreed	Agreed	Agreed	Agreed	Under discussion	Under discussion	-
Chelmsford City Council	-	-	-	-	-	-	-
Brantwood Borough Council	-	-	-	-	-	-	-
Basildon Borough Council	-	-	-	-	-	-	-

Responses to New Matters and Applicant Clarifications

- 4.7.8 The table below sets out the Applicant's response to the matters raised in the Local Impact Reports that the Applicant previously has not addressed in their documents, including Statements of Common Ground with Local Authorities or in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**.

Table 4.12 Contaminated Land, Geology and Hydrogeology – Responses to New Matters and Applicant Clarifications

ID	Stakeholder	Comment	NG response
15.4	Suffolk County Council	Where minerals are extracted on site during the course of construction then they should be used in the construction of the proposed development where possible. Removal of the development following	Noted

ID	Stakeholder	Comment	NG response
		cessation of use should be required to restore access to mineral resources.	
Appendix A	Thurrock Council	Contamination of land or groundwater and controlled waters If during any stage of the authorised development, contamination within the Order limits is identified as a result of the confirmatory ground investigations or unexpected contamination discovery procedures described in chapter 9 of the Environmental Statement (Document - Contaminated Land Geology and Hydrogeology) and the code of construction practice, and this contamination is considered to present a significant possibility of significant harm to persons or pollution of controlled waters or the environment then, except in the case of emergency, no further development in the vicinity of the contamination may be carried out until a written scheme to identify the extent of the contamination and any mitigation or remedial measures to be taken to render the land fit for its intended purpose has been submitted to and approved by the relevant planning authority, following consultation with the Environment Agency. Should mitigation or remedial measures be required then they must be carried out in accordance with the approved scheme referred to in paragraph (1) and, if remedial measures are required, their implementation and validation documented in a verification report submitted to the planning authority.	Commitment GH08 in 7.2 Outline Code of Construction Practice (Revision B) secures the requirement for a protocol for dealing with any unexpected contamination.

ID	Stakeholder	Comment	NG response
		In this requirement (contamination of land or groundwater and controlled waters), "controlled waters" has the same meaning as in Part 2A of the Environmental Protection Act 1990(a).	
9.5.1, 10.7.1, 11.3.1	South Norfolk District Council	The following topics require additional or expanded Requirements to ensure appropriate control during construction and operation: - Contaminated land and groundwater management The Draft DCO contains several deficiencies that require rectification, including: - Insufficient Requirements relating to contaminated land The Council's review of the Draft Development Consent Order identifies several gaps and ambiguities in the proposed Requirements, including missing provisions for contaminated land.	7.2 Outline Code of Construction Practice (Revision B) includes commitments GH01 through to GH12, specific to contaminated land, geology and hydrogeology. This document will be secured under Schedule 19 (Certified documents) of 3.1 Draft Development Consent Order [Revision B] giving it no lesser status than the DCO Requirements. The baseline assessment presented in 6.9 Environmental Statement Chapter 9 - Contaminated Land, Geology and Hydrogeology [APP-181] identified a generally low risk related to potential contamination, and a very low to low risk to groundwater associated with the Project. The commitments are considered sufficiently protective for the identified receptors (including groundwater) in relation to potential contamination.

4.8 Health and Wellbeing

Introduction

- 4.8.1 The Health and Wellbeing assessment (**6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**) has been undertaken in line with the requirements of national and local policy and guidance.
- 4.8.2 The Applicant has consulted with Local Planning Authorities which the Project passes through in relation to the methodology and approach to assessment on health and wellbeing.
- 4.8.3 As identified within the submitted Local Impact Reports, the key areas of disagreement remain around the assessment of impacts relating to mental health and wellbeing, the approach to cumulative assessment in relation to intra-project impacts during the construction phase, the approach to inter-project cumulative assessment, and the requirement for the creation of a health and wellbeing monitoring framework. These matters have been responded to through the SoCG process and we will continue to engage with the host authorities to reach further areas of agreement where possible.

Local Authority Positions

- 4.8.4 Nine Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 4.13 Health and Wellbeing - Local Impact Report coverage

Local Authority	LIR sections covering this topic
Norfolk County Council	Section 8
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	Section 17 (see the table below for detailed responses to paragraphs 17.44, 17.50, 17.51, 17.80, 17.85)
Essex County Council	Section 2 and Section 4.9 (see the table below for detailed responses to paragraphs 2.5.20, 2.5.23, 4.9.30, 4.9.31, 4.9.34, 4.9.36, 4.9.41, 4.9.47, 4.9.50)
Thurrock Council	Section 6.8 (see the table below for detailed responses to paragraphs 6.8.10, 6.8.11, 6.8.28)
South Norfolk District Council	N/A
Tendring District Council	Section 14 (see the table below for detailed responses to paragraphs 14.1, 14.5, 14.15 – 14.21)
Colchester City Council	Section 9

Local Authority	LIR sections covering this topic
	(see the table below for detailed responses to paragraphs 9.19, 9.42)
Braintree District Council	Section 17.4
Chelmsford City Council	Paragraphs 8.146 – 8.164
Brentwood Borough Council	Paragraphs 6.43 – 6.47 (see the table below for detailed responses to paragraphs 6.45, 6.46)

- 4.8.5 The Applicant has engaged extensively with Local Authorities on matters relating to Health and Wellbeing. This is reported in detail in Statements of Common Ground (SoCGs) (see Table 1.1 for Examination Library references). Within the SoCGs, matters are categorised as Agreed, Not Agreed or Under Discussion.
- 4.8.6 Each SoCG includes a table listing each environmental topic chapter in the Environmental Statement. Under each environmental topic chapter subheading, are a list of seven categories which are aligned with how the Environmental Impact Assessment was undertaken.
- 4.8.7 The bullet points below (split by category) provide a summary of where agreements are currently up to with the host Local Authorities relating to Health and Wellbeing (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG). For matters related to Health and Wellbeing, Braintree District Council defers to Essex County Council and South Norfolk District Council defers to Norfolk County Council.
- Matters relating to EIA – Regulatory, Planning Policy Context and Guidance are under discussion with nine out of twelve Local Authorities
 - Matters relating to EIA – Approach and Methods are under discussion with seven out of twelve Local Authorities
 - Matters relating to EIA – Baseline Conditions are under discussion with nine out of twelve Local Authorities
 - Matters relating to EIA – Embedded, Standard and Additional Mitigation Measures are under discussion with nine out of twelve Local Authorities
 - Matters relating to EIA – Assessment Conclusions are under discussion with ten out of twelve Local Authorities
 - Matters relating to the Draft DCO / Outline Management Plans / Mitigation and Monitoring are under discussion with ten out of twelve Local Authorities.

4.8.8 The table below reflects the category (agreed, under discussion, not agreed), most frequently recorded across the SoCGs for each of the 13 Local Authorities relating to Health and Wellbeing (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG).

Image 4.4 Health and Wellbeing - Categorisation of Matters in Statements of Common Ground

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Condition	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring	Other Matters as Required
Norfolk County Council	Agreed	Agreed	Agreed	Agreed	Agreed	Agreed	-
Suffolk County Council	Under discussion	Under discussion	Under discussion	Agreed	Under discussion	Under discussion	-
Essex County Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	-
Thurrock County Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	-
South Norfolk Council	Responded by NCC	Responded by NCC	Responded by NCC	Responded by NCC	Responded by NCC	Responded by NCC	Responded by NCC
Babergh and Mid Suffolk Councils	Under discussion	Agreed	Under discussion	Not applicable	Under discussion	Not applicable	Under discussion
Tendring District Council	Agreed	Agreed	Agreed	Under discussion	Under discussion	Under discussion	-
Colchester City Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	-

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Condition	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring	Other Matters as Required
Braintree District Council	Responded by ECC	Responded by ECC	Responded by ECC	Responded by ECC	Responded by ECC	Responded by ECC	Responded by ECC
Chelmsford City Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion
Brentwood Borough Council	Under discussion	Agreed	Under discussion	Under discussion	Under discussion	Under discussion	-
Basildon Borough Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	-

Responses to New Matters and Applicant Clarifications

- 4.8.9 The table below sets out the Applicant's response to the matters raised in the Local Impact Reports that the Applicant previously has not addressed in their documents, including Statements of Common Ground with Local Authorities or in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**.

Table 4.14 Health and Wellbeing – Responses to New Matters and Applicant Clarifications

ID	Stakeholder	Comment	NG Response
6.45, 6.46	Brentwood Borough Council	Specific locations are identified (Haverings Grove and Rayleigh Road corridor) where residents include individuals with protected characteristics and complex sensory needs; concern that prolonged construction activities (including extended working hours and	Paragraph 10.4.28 in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] notes as part of the limitations of the assessment that health effects are considered at a population, rather than an individual level. Whilst it is acknowledged that there are

ID	Stakeholder	Comment	NG Response
		associated traffic behaviours) may cause acute distress. Reference made to the Public Sector Equality Duty and the need for targeted measures to minimise disturbance.	individuals along the Project route with different health needs and vulnerabilities, effects are presented in relation to the general population, in relation to vulnerable groups, or at ward level where relevant for particular effects. This population-based approach is consistent with health impact assessment methodologies and is proportionate and appropriate for a project of this scale and nature. The approach to identifying vulnerable groups (including individuals with protected characteristics, which include those with various types of disability or health need) has been set out in paragraph 10.4.19 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192].
9.19	Colchester City Council	It is worth repeating that open access land and PROW near Fordham regularly used by residents will be severely impacted by the pylons, leading to diversion and closure of sections of the PROW.	7.6 Outline Public Rights of Way Management Plan [APP-329] ‘Outline PROW Management Plan’ identifies various routes in the vicinity of Fordham that may be affected by the Project, including duration of impact and management measures (which relate to temporary closures and diversions for a number of the Fordham routes). The Outline PROW Management Plan would be developed into a final document by National Grid’s appointed Main Works Contractor(s) to discharge Requirement 4 of 3.1 Draft Development Consent Order [APP-056] ahead of the commencement of any construction activities; a regular dialogue would be maintained with PROW Officers throughout the construction period of the Project. No areas of open access land (as defined under the Countryside and Rights of Way Act) are directly impacted by the Project in the Fordham area. The Fordham Hall Estate, which is leased to the Woodland

ID	Stakeholder	Comment	NG Response
			Trust, is not statutorily defined as open access land; impacts on this area of woodland are described in 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265] relate to temporary land-take during the construction phase. Given the rolling nature of the linear works, the construction activities in any particular area are likely to be short-term. The residual construction effect is described as temporary, short-term, minor adverse and not significant.
9.42	Colchester City Council	CCC has summarised key aspects of their requirements for the Health and Wellbeing topic as follows: • Updated assessment incorporating October 2025 IMD and LSOA-level data for Colchester. • Integration of local health and wellbeing strategies and ICS Joint Forward Plans. • Inclusive engagement measures for language-vulnerable communities. • Consideration of cumulative mental health impacts through MWIA workshops. • A robust Health and Wellbeing Monitoring Framework with enforceable commitments.	The Applicant welcomes the summary of key aspects of Colchester City Council’s concerns, however, it is not considered that further work or actions are considered necessary: • October 2025 IMD data have been reviewed for Colchester and it is not considered to materially change the conclusions of the Health and Wellbeing assessment. • A review of local health and wellbeing strategies was completed as part of the Health and Wellbeing assessment. • The Applicant is aware that there are language-vulnerable communities within proximity of the Project route and set out appropriate methods to engage with people for whom English is a second language in 5.1 Consultation Report - Appendix E: Statement of Community Consultation (SoCC) [APP-071]. • We understand from statutory and non-statutory consultation already undertaken that the principal concerns of local residents from a mental health and wellbeing perspective centre around stress and

ID	Stakeholder	Comment	NG Response
			anxiety associated with impacts on quality of life / wellbeing during the construction and operational phases as well as perceptions of the impacts of EMF on health and wellbeing. In relation to the latter, resident concerns, feelings and perceptions of safety as they relate to EMFs is something the Applicant has considered throughout the Project. The Applicant operate a public EMF helpline available for residents to contact and discuss any aspects of EMF as well as a website, www.emfs.info to provide factual information about EMFs from electricity infrastructure. The EMF helpline provides the opportunity for one to one conversations with individuals (in the same way as a workshop might provide) and both the helpline and the website have been available throughout the consultation period for the Project. • There is no requirement for monitoring measures for health and wellbeing because no significant effects have been identified.
17.44	Suffolk County Council	<i>Impact on access to PROWs and social infrastructure (including healthcare)</i> The project proposes temporary and, in some cases, permanent closures and diversions of Public Rights of Way ("PROW") ([APP-329], table 10.3), as well as temporary closures and diversions affecting green/blue spaces ([APP-329], table 8.2) and access to social infrastructure ([APP-192], table 10.4). Anticipated closures lasting weeks or months, and even shorter or more localised disruptions, can have a disproportionate effect on physical activity, social connectedness and mental wellbeing. These impacts	An assessment of the impact of the Project on physical activity during the construction phase is presented in 6.10 Environmental Statement – Chapter 10 Health and Wellbeing [APP-192]. The assessment acknowledges that vulnerable populations of high sensitivity to changes in opportunities to undertake physical activity include children, people in low-income households or without access to private transport who may be less able to find alternative opportunities for physical activity and people with poor physical or mental health who may benefit from physical activity. The assessment concludes that, although physical

ID	Stakeholder	Comment	NG Response
		are likely to be felt most acutely by older people, individuals with limited mobility, and households without access to private transport. The potential for harm is amplified where multiple closures, increased construction traffic, and elevated noise levels coincide with other NSIPs in the area. Under these conditions, there is a heightened risk of widening existing health inequalities, as those already experiencing barriers to good health are the most affected by the loss of accessible, low cost opportunities for daily activity, social interaction, and engagement with their local environment.	activity is a local public health priority and there is established evidence connecting the benefits of physical activity to both physical and mental health, the level of change due to the Project is low and appropriately mitigated by standard good practice construction management measures. As such, the effect of the Project on physical activity is considered to be not significant for both the general population and vulnerable groups. Cumulative effects are considered in 6.17 Environmental Statement Chapter 17- Cumulative Effects [APP-281]. Where other development presents a potential inter-project cumulative effect in relation to specific PRowS, appropriate PRow management measures (for example diversion routes) would be implemented to minimise disruption to physical activity.
17.50	Suffolk County Council, Mid Suffolk District Council, Babergh District Council	From a public health perspective, whilst the assessment aligns with current guidance, there are limitations that should be acknowledged. These include reliance on qualitative judgement, the absence of direct baseline data on mental health and the focus on population level rather than individual or community level impacts, which means that impacts on those most affected may be understated, particularly for vulnerable populations.	The Applicant welcomes the recognition by a number of Local Planning Authorities that 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] aligns with current guidance. Limitations for the Health and Wellbeing assessment are clearly set out in paragraph 10.4.28 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. These include the focus on population level impacts, the reliance on third-party, publicly available health data, and the fact that health assessments are by their nature predominantly qualitative and based on guidance and professional judgement, used to interpret the assessment outcomes. Evidence from literature, accepted and adopted by the public health profession has been used in this process and is considered good practice.

ID	Stakeholder	Comment	NG Response
17.51	Suffolk County Council, Mid Suffolk District Council, Babergh District Council	A particular concern for public health is the proposed construction working hours, which, as currently set out in [APP-300] paragraphs 2.2.3 – 2.2.8, would allow activities from as early as 07:00 -19:00 on weekdays plus a provision for start up and close down activities up to 1 hour either side of these core working hours, and from 07:00 – 17:00 on weekends and bank holidays. This leaves local communities with little opportunity for respite from construction related noise, vibration, traffic, and disruption. Continuous exposure to these stressors, especially when compounded by overlapping NSIPs in the region, is likely to have a substantial impact on mental health and wellbeing. Vulnerable groups, including older people, disabled residents, and those without access to private vehicles, may be disproportionately affected, as they have fewer options for respite or alternative travel. The lack of quiet periods and predictability in daily life can exacerbate stress, anxiety, and feelings of powerlessness, and may contribute to health inequalities within the affected communities.	6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] considered residual effects associated with changes to noise and vibration during the construction phase. Paragraph 10.7.13 of Chapter 10 summarises impact pathways which include the impact that noise-related stress can have on people. Paragraph 10.7.14 identifies groups who may be particularly vulnerable to noise-related effects, including older people, people with pre-existing physical and mental health conditions, and people in low-income households (a higher proportion of whom are less likely to have access to private vehicles). These groups are assessed as having sensitivity to changes in noise level. The assessment of likely health effects has been informed by findings from 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256] . This chapter has identified a range of potential mitigation measures that would be implemented during the construction phase. 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] notes that the magnitude of impact on health is therefore considered to be negligible with a resulting negligible and not significant effect across all wards for both general and vulnerable populations; and that health effects are likely to be experienced at individual rather than at population level, accordingly.
17.80	Suffolk County Council, Mid Suffolk District Council, Babergh	Public Health recognises that, even with reasonable measures in place, there will be an unavoidable residual negative impact on local access, amenity, and community wellbeing relative to the existing baseline. While the proposed mitigations will reduce disruption, they cannot eliminate it entirely.	There is no requirement for monitoring measures for health and wellbeing because no significant effects have been identified. Table 10.14 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] contains the findings from the assessment of potential impacts on mental health and

ID	Stakeholder	Comment	NG Response
	District Council	Consequently, the overall effect on local residents, visitors, and businesses during the construction period is expected to remain adverse. Public Health recommend targeted monitoring of health and wellbeing outcomes for affected communities is undertaken. Processes should be put in place and documented to communicate and engage with users of PROWs, schools, and social infrastructure (including healthcare providers) to ensure timely information about closures, diversions, and mitigation measures. Additionally, the Applicant should proactively distribute mental health resources (e.g. WellMinds, provide funded Mental Health First Aid training for community members, and support local mental health organisations to mentor volunteers, as recommended in the Suffolk County Council Community Engagement and Wellbeing SGD.	wellbeing during the construction phase and includes opportunities for mitigation such as appropriate communication and awareness-raising of construction activities. The approach to informing PROW users of changes to the PROW network during construction is set out in 7.6 Outline Public Rights of Way Management Plan [APP-329] .
17.85	Suffolk County Council, Mid Suffolk District Council, Babergh District Council	Learning from monitoring arrangements associated with other NSIPs, including Sizewell C, suggests that a multi-layered approach is more robust. This may include: i. Population health management (PHM) data and trends in Primary Care activity; ii. Monitoring of referrals to social prescribing and community mental health services; iii. Engagement with Primary Care leads within the project catchment to identify emerging trends; iv. Regular liaison with Community Mental Health Teams;	The Applicant notes this comment. However, there is no requirement for monitoring measures for health and wellbeing because no significant effects have been identified in the assessment undertaken in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] .

ID	Stakeholder	Comment	NG Response
		v. Clear community routes for raising concerns (with mechanisms to ensure issues are captured, categorised and escalated appropriately); vi. Periodic reporting to relevant local authority and health partnership forums to enable two-way dialogue; vii. Consideration of independent or academic evaluation to provide objective assessment of early and cumulative impacts including work undertaken by Suffolk MIND and University of Suffolk; and viii. Following SCC's guidance on community engagement.	
2.5.20	Essex County Council	ES Chapter 10 (APP-192) identifies sensitive receptor clusters along primary access routes, including residential zones and schools but stops short of evaluating cumulative exposure for these receptors. Construction will introduce: • Higher risk of real and perceived road safety issues, especially for pedestrians and cyclists • Reduced active travel, with health consequences • Amenity loss from noise, dust and severance	Impacts on community safety (traffic) have been assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] in relation to the potential for increases in traffic on the road network which could increase risk to users of the roads, including pedestrians and cyclists. Impacts associated with reduced active travel have been considered in relation to physical activity and the potential for disruption to PRowS or areas of open space which may affect opportunities for physical activity. Health impacts associated with amenity loss from construction activities (noise and dust) are described in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] paragraphs 10.7.12 to 10.7.20 and 10.7.3 to 10.7.11 respectively; health effects arising from changes in accessibility to social infrastructure are set out in paragraphs 10.7.47 to 10.7.62); health effects arising from disruption to walking and cycling routes and areas of open space

ID	Stakeholder	Comment	NG Response
			during construction are described in paragraphs 10.7.86 to 10.7.187. No significant effects have been identified for health and wellbeing in relation to these aspects.
2.5.23	Essex County Council	ES Chapter 10 does not sufficiently reflect the sensitivity exhibited by the demographic, environmental and socioeconomic characteristics of Essex, nor does it address how vulnerable populations will be differentially affected, despite acknowledging their existence in the baseline. This represents a material gap against EN-1 requirements.	The demographic, environmental and socio-economic characteristics of Essex have been described in Section 10.5 'Baseline Conditions' in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] and in 6.10.A1 Environmental Statement Appendix 10.1 - Health and Wellbeing Baseline Statistics [APP-193] . How vulnerable populations would be differentially affected has been summarised in Table 10.5 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] and in the overview of impact pathways described for each health determinant.
4.9.30 and 4.9.31	Essex County Council	However, the ES (APP-192) does not link disability prevalence to transport severance, PRoW closures, landscape change, or noise impacts. Sensitivity scoring appears inconsistent with WHIASU guidance, which requires that disability be treated as a determinant of heightened susceptibility. The County Council considers therefore that disabled populations are highly sensitive receptors and must be assessed as such for all determinants including noise, visual change, access, and community severance.	Table 10.5 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] describes vulnerable groups within the population that are considered as part of the Health and Wellbeing assessment, the social receptor where this group is most likely to be present and the justification for why these groups have been identified. This is in line with Wales Health Impact Assessment Support Unit (WHIASU) good practice (WHIASU, 2021)⁵⁸ and includes people with pre-existing health conditions and / or disabilities. The ways in which vulnerable populations may be differentially affected are summarised in Table 10.5 of

⁵⁸ Wales Health Impact Assessment Support Unit (2021) Health Impact Assessment – A Practical Guide. <https://phwwhocc.co.uk/wp-content/uploads/2020/07/Health-Impact-Assessment-A-Practical-guide.pdf>

ID	Stakeholder	Comment	NG Response
			6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] and in the overview of impact pathways described for each health determinant. For example, for people with poor health status or who are disabled, Table 10.5 notes that this group is likely to be more vulnerable to changes in health determinants, and more likely to be impacted by adverse changes in noise levels, to be more sensitive to changes in their local environment and more vulnerable to changes relating to transport and access because they are less likely to drive.
4.9.34	Essex County Council	Overall, it is considered that the baselines point to clear health vulnerabilities. Therefore, impacts on PRowWs, footpaths, and cycling routes should be considered major adverse unless comprehensively mitigated.	It is noted that there are clear health vulnerabilities in particular geographies along the Project, including wards which are described as being of higher sensitivity due to their socio-economic and health characteristics. This is described in paragraph 10.7.106 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] in relation to wards within which impacts on PRowWs, footpaths and cycling routes have been identified (Table 10.13 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]). Paragraph 10.7.107 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] notes that the duration of effects that may potentially affect people’s ability to be physically active (e.g., closures of PRowWs) are generally short term, with rapid reversal / diversions in place. Whilst a relatively small minority of the population would be affected in each ward (despite some wards potentially experiencing a greater level of disturbance), alternative routes and provision of recreational areas are generally available for use for

ID	Stakeholder	Comment	NG Response
			the period over which effects are predicted to last. Impacts are considered to be appropriately mitigated by standard good practice construction management measures as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329] .
4.9.36	Essex County Council	Mental health prevalence in LSOAs in Tendring, Basildon, and Colchester is known to exceed regional averages, however, the ES treats mental health as a secondary or perception-based issue, which is inconsistent with EN-1 (para 4.4.4 – 4.4.6).	The Applicant disagrees with the statement that the Environmental Statement treats mental health as a secondary issue. 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] states in paragraphs 10.4.10 to 10.4.12 that the approach taken in relation to the assessment is based on the World Health Organization definition of health and references the role of both physical and mental health and wellbeing. The assessment acknowledges health priorities of local authorities through which the Project passes, many of which relate to mental health and wellbeing. The assessment itself uses the Mental Impact Assessment Toolkit (Cooke <i>et al.</i>, 2011⁵⁹), which is a good practice approach, to identify and describe potential impacts on local residents during the construction and operation phases. This methodology was discussed with Essex County Council as part of Health and Wellbeing stakeholder workshops prior to submission. Mental wellbeing impacts relating to perception of health impacts as a result of Electric and Magnetic Fields (EMFs) have been included within the assessment. Health impacts associated with EMFs themselves have been scoped out of the

⁵⁹ Cooke, A., Friedli, L., Coggins, T., Edmonds, N., Michaelson, J., O'Hara, K., Snowden, L., Stansfield, J., Steuer, N., Scott-Samuel, A. (2011) Mental Wellbeing Impact Assessment Toolkit. 3rd ed., London: National MWIA Collaborative

ID	Stakeholder	Comment	NG Response
			Environmental Statement and a separate EMF Compliance Report has been provided (7.8 Electric and Magnetic Field Compliance Report [APP-330]). However, as stated in paragraph 10.7.135 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] , during statutory and non-statutory consultation, feedback emerged from local communities relating to ongoing anxieties about the perceived effects of EMFs, particularly on vulnerable populations such as children.
4.9.41	Essex County Council	The ES concludes that impacts on physical activity are negligible to minor (Table 10.13) (APP-192). However, given the baseline, poor physical activity levels, high chronic disease burden, limited alternative routes, dependency on PRowWs in rural communities and vulnerable populations concentrated along portions of the route, there should be consideration of PRowW enhancement plan with commitments to pre-programmed diversions that maintain route continuity, permanent GI improvements along affected routes. There should be clear signage, safety measures and accessibility provisions and compensation to parishes where PRowW access forms part of community identity and tourism.	Good practice construction management measures relating to PRowWs are set out in 7.6 Outline Public Rights of Way Management Plan [APP-329] . The impacts of the Project as they relate to tourism are covered in 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265] . Paragraph 15.7.17 of Chapter 15 states that while it is acknowledged that there are significant residual visual changes, construction traffic noise, and changes in journeys and amenity at particular locations anticipated as a result of the Project, these effects are not expected to affect the wider area as a whole and are unlikely to deter visitors or substantially alter the appeal of the destination for tourists.
4.9.47	Essex County Council	The ES uses average exposure, not peak disruption and lacks a mental-health sensitive analysis. Mitigation should consider noise insulation grants, quiet working protocols, no-nighttime works near sensitive receptors and real-time noise monitoring published online	The methodology used to assess the effects on Noise and Vibration is set out in 6.19 EIA Scoping Report [APP-288] and agreed in 6.20 EIA Scoping Opinion [APP-297] . 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256] provides an assessment on noise mitigation as a result of the Project. Mitigation

ID	Stakeholder	Comment	NG Response
			measures are outlined within 7.2 Outline Code of Construction (Revision B) .
4.9.50	Essex County Council	Linear NSIPs can fracture communities, cause severance (physical and perceived), uncertainty and anxieties, decline in neighbourly interaction due to disruption and loss of public space. The ES has minimal qualitative assessments and no MWIA workshops were undertaken. ECC considers based on the mental health assessment framework used (MWIA), impacts are moderate adverse and unmitigated. Communities in Tendring, and Braintree have low baseline social cohesion as identified in the Joint Strategic Needs Assessment. Landscape disruption and PRow loss amplify these vulnerabilities. Mitigation plan should consider air quality monitoring with public reporting, dust suppression commitments, avoiding HGC routing past schools or care homes and temporary re-routing of active travel corridors.	A number of these measures have already been included in the submission documents. Examples include good practice relating to dust suppression as set out in 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304]. 6.7 Environmental Statement Chapter 7 – Air Quality [APP-147] and 6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150] conclude that with appropriate application of dust mitigation there would likely be no significant effect to human health from construction dust. 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 impact on walking, cycling and horse-riding modes on the roads along the Primary Access Routes located in the Local Road Network that would access the haul roads to construction sites. 7.11 Transport Assessment [APP-333] examines capacity, safety and operational efficiency of the network, identifying potential bottlenecks or safety concerns. Within the assessment of the relevant Environmental Statement chapters and the Transport Assessment, mitigation measures are proposed to minimise likely adverse impacts.

ID	Stakeholder	Comment	NG Response
6.8.10 and 6.8.11	Thurrock Council	Paragraph 5.13.4 - The Applicant's Assessment should consider all relevant socio-economic impacts, which may include: Specifically - the impact of a changing influx of workers during the different structure, operation and decommissioning phases of the energy infrastructure. This could change the local population dynamics and could alter the demand for services and facilities in the settlements nearest to the construction work (including community facilities and physical infrastructure such as energy, water, transport and waste). There could also be effects on social cohesion depending on how populations and service provision change as a result of the development. Cumulative effects - if development consent were to be granted for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region. In response, the Council comment that, an assessment of the potential impacts on healthcare infrastructure should be undertaken, especially given the proportion of construction workers coming in from outside of the Borough. Further information is required from the applicant about what health infrastructure and welfare facilities will be provided for construction workers within each of the Construction Compounds in Thurrock.	All relevant socio-economic impacts have been considered as part of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. This includes impacts associated with changing local population dynamics and cohesion as a result of an influx of construction workers. The assessment has considered the potential for certain sensitive groups (such as older people) to feel more vulnerable as a result of the presence of construction workers/activity in an area, with opportunities highlighted to help overcome this, including community engagement and awareness raising as set out in 7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305] and dissemination of information to local communities during the construction period via the Project website. It is also worth highlighting the number of construction workers on site at any one time; 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265] states that there would be an average of around 1,720 full-time-equivalent workers across the 180 km route at any one time and that this is a relatively modest number when compared to large-scale developments in other sectors.
6.8.28	Thurrock Council	Long-term changes to visual amenity may impact on perceived quality, usability and attractiveness of open	6.13.A3 Environmental Statement Appendix 13.3: Visual Baseline and Assessment Parts 1, 2, 3 and 4

ID	Stakeholder	Comment	NG Response
		spaces and PRowWs for physical activity, leisure and recreation. This could have consequential impacts on the achievement of increasing the levels of participation in physical activity by adults and children across the Borough but particularly in the areas of Orsett, Stanford-le-Hope and East Tilbury.	[APP-229 to APP-232] describes the impact for receptors for each Visual Receptor Area, which include users of the PRow network and areas of open access land. Visual receptors within Thurrock predicted to experience significant effects during operation (and maintenance) include the areas of Orsett, Stanford-le-Hope and East Tilbury. No significant effects relating to the usability of PRowWs or areas of open space have been identified during the operational (and maintenance) phase in 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Wellbeing [APP-265]. 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] states that, whilst evidence identifies a link between visual change and health outcomes, there is also evidence that suggests habituation and adaptation with time in terms of user experience.
14.1	Tendring District Council	TDC remains seriously concerned that the N2T project will generate material adverse health and wellbeing impacts for communities in Ardleigh, Little Bromley, Lawford, Manningtree and Mistley, particularly along key PAR's (notably Bentley Road) and near construction compounds and work fronts. TDC considers that ES Chapter 10 – Health and Wellbeing systematically downplays local impacts by relying on population-level judgements and one-sided “after-mitigation” significance tests, which mask severe,	6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] has been informed by relevant guidance and good practice and represents a proportionate and robust approach for a Health and Wellbeing assessment for a project of this scale and nature. Technical workshops for health and wellbeing stakeholders were held in 2024, at which the guidance, scope and assessment methodology used for the Health and Wellbeing assessment were discussed. The use of IEMA ⁶⁰ and WHIASU guidance ⁵⁸ has been

⁶⁰ Institute of Environmental Management and Assessment (IEMA) (2017) Health in Environmental Impact Assessment – A Primer for a Proportionate Approach [Online] https://www.academia.edu/43935454/Health_in_Environmental_Impact_Assessment_A_Primer_for_a_Proportionate_Approach, Institute of Environmental Management and Assessment

ID	Stakeholder	Comment	NG Response
		highly localised effects in Tendring's quiet rural settlements and among vulnerable groups.	accepted by other Local Authorities along the Project route and is considered to be good practice for health and wellbeing assessments. Paragraph 10.4.28 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] notes as part of the limitations of the assessment that health effects are considered at a population, rather than an individual, level. This population-based approach is consistent with health impact assessment methodologies and is proportionate and appropriate for a project of this scale and nature. While it is acknowledged that there are individuals along the Project route with different health needs and vulnerabilities, effects are presented in relation to the general population, in relation to vulnerable groups, or at ward level where relevant for particular effects.
14.5	Tendring District Council	TDC's position is that standard measures (such as generic BPM and discretionary wording in the CoCP) are insufficient to protect residents in Ardleigh/Little Bromley and along all primary access road and other roads that will be used for construction traffic, in particular Bentley Road where prolonged HGV flows and night/evening activities would be highly disruptive to sleep, family life and mental wellbeing. As set out elsewhere in this LIR and in TDCs SOCG with NGET, additional,	The Applicant is committing to employing best practicable means (BPM) to reduce the effects of construction noise and vibration. Specific mitigation measures will be determined following detail by the Main Works Contractor(s), as per commitment NV05 of 7.2 Outline Code of Construction Practice (Revision B). Mitigation in the form of BPM will be identified and employed to avoid potential significant adverse effects and reduce potential adverse effects as per the range of commitments in the 7.2 Outline Code of Construction Practice (Revision B), and 7.2 Outline

(IEMA) (2022) Determining Significance for Human Health in Environmental Impact Assessment [Online] <https://www.iema.net/media/yljb2nbs/iema-eia-guide-to-determining-significance-for-humanhealth-nov-2022.pdf>, Institute of Environmental Management and Assessment

(IEMA) (2022) Effective Scoping of Human Health in Environmental Impact Assessment [Online] <https://www.iema.net/media/s35fughe/iema-eia-guide-to-effective-scoping-of-human-health-nov-2022.pdf>

ID	Stakeholder	Comment	NG Response
		location-specific mitigation and enforceable limits are required.	Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306].
14.15 to 14.21	Tendring District Council	TDC requests that the ExA require the following Tendring-specific measures (to be secured via Requirements, certified plans or legal obligations), in order to avoid, reduce and remedy local health and wellbeing harm: Construction Traffic/Noise Controls for Bentley Road and Adjacent Lanes • Capped daily HGV flows, time-of-day restrictions, no evening/night HGVs, and advance works black-outs during sensitive periods (e.g., school runs). • Mandatory low-noise surfacing, temporary traffic calming, and on-plot acoustic protection (temporary or permanent) where modelled/monitored triggers are exceeded. • Real-time noise and vibration monitoring at agreed receptors with publication dashboards and automatic stand-down/escalation protocols tied to numeric thresholds. Health & Wellbeing Monitoring Framework (Tendring) • A co-designed baseline and monitoring programme (with TDC, ICS/Public Health, local practices and community reps) covering sleep disturbance, stress/anxiety indicators, complaint analytics, PRow usage and access to services, with quarterly public reporting and mitigation “triggers”.	The comments raised by Tendring District Council in paragraphs 14.17 to 14.21 are noted and have been responded to in relation to other relevant sections of this document (Traffic and Transport; Noise and Vibration). In regard to comments made relating to a Health and Wellbeing Monitoring Framework, there is no requirement for monitoring measures for health and wellbeing because no significant effects have been identified in the assessment undertaken in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. In relation to EMF engagement, the Applicant provides open and transparent information about EMFs on a website, including what EMFs are, exposures from electricity infrastructure, research into health effects and the policies and guidelines in place to protect against EMFs for members of the public to access. An EMF helpline is also available to answer any questions or concerns about the subject. EMF specialists have been present at all public consultation events to discuss and address any concerns. These measures are aimed at providing information on EMFs and the protection measures in place, helping to reduce anxiety around the subject prior to construction and operation (and maintenance) of the Project. Provision of support and information in this way will continue during the operation (and maintenance) phase of the Project.

ID	Stakeholder	Comment	NG Response
		PRoW, NMU and Safe Movement Package • Mapped, fully segregated NMU routes where HGVs intersect with everyday pedestrian/horse-rider movements; short, signed diversions with quality surfaces/lighting where appropriate, and continuity of rural leisure routes. • Micro-grants for community route guardianship, wayfinding, and rural wellbeing walks during construction phases. Targeted Psychosocial Support & EMF Communications • Independent, clinician-led drop-ins and fast-tracked signposting for construction stress and sleep problems; evidence-based EMF engagement with accessible materials, local Q&A sessions, and named liaison for Tendring residents. Community Liaison & Complaints Resolution • A single, visible Tendring liaison team, minimum service standards (response times, case tracking), and binding escalation to pause activities if agreed noise/traffic limits are breached pending remedial action. Cumulative Impact Management • A Tendring Construction Coordination Plan aligning programmes across NSIPs (traffic windows, noisy works), with joint dashboards and cross-promoter escalation to protect community health and wellbeing	In relation to community liaison, 7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305] confirms that a community relations team will be appointed to engage with local residents and provide dedicated community relations and external communications support. Finally, in relation to cumulative impact management, we note the suggestion for a Tendring Construction Coordination Plan aligning programmes across NSIPs. The Applicant has engaged with other developers who are proposing development in proximity of the Project to understand their requirements. 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]. The Cumulative Effects chapter has assessed the potential inter-project cumulative effects. The detailed assessment of the Project with other developments can be found in 6.17.A1 Appendix 17.1 – Inter-Project Cumulative Effects [APP-282]. The assessment of clusters of other developments on common receptors can be found in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. No significant cumulative impacts relating to health and wellbeing have been identified.

4.9 Historic Environment

Introduction

- 4.9.1 The Historic Environment environmental assessment has been undertaken in accordance with **6.19 Scoping Report [APP-288 - APP-296]**, **6.20 Scoping Opinion [APP-297]**, and the methodology set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**, which is aligned with Historic England and Chartered Institute for Archaeologists standards and guidance and informed by professional judgement. Historic Environment walkover surveys have been undertaken across 97% of the Order Limits. Geophysical survey has been undertaken across 96% of priority areas and 30% of phase 2 areas, at the point of submission of Supplementary Environmental Information **[AS-068 to AS-083]**. This represents a combined total of 74% of the overall geophysical survey area. The phase 2 survey is currently ongoing. Archaeological trial trenching has been completed for 89% of priority areas at the point of submission of Supplementary Environmental Information **[AS-068 to AS-083]**. For the remainder of the Project's areas of impact a reasonable worst-case assumption has been made regarding archaeological potential and Project impacts.
- 4.9.2 The methodology for the historic environment assessment has been the subject of ongoing discussions with heritage stakeholders (including Historic England and archaeological advisors to Local Planning Authorities) through regular thematic group meetings. The approach to archaeological evaluation and mitigation is under regular discussion with archaeological advisors to Local Planning Authorities and Historic England. Results from ongoing archaeological evaluation is also shared regularly with archaeological advisors to Local Planning Authorities and Historic England and meetings are regularly held on site with representatives.
- 4.9.3 As identified within the submitted Local Impact Reports, the key areas of disagreement remain around assessment conclusions for a small proportion of heritage assets and the archaeological evaluation and historic environment mitigation provisions within control documents and **3.1 Draft Development Consent Order [APP-056]**. These matters have been responded to through the SoCG process and we will continue to engage with the host authorities to reach further areas of agreement where possible.

Local Authority Positions

- 4.9.4 All Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 4.15 Historic Environment - Local Impact Report coverage

Local Authority	LIR Sections covering this topic
Norfolk County Council	Section 9
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	Section 8, Section 9 and Annex A (see the table below for detailed responses to paragraphs 7.28, 7.38, 7.42, 7.47, 7.67, 8.37 – 8.39, 8.54, 8.55, Annex A Table 1: 1.1,

Local Authority	LIR Sections covering this topic
	Annex A Table 2: 2.1, 2.6, 2.7, Annex A Table 3: 3.1, 3.2, 3.5, 3.7-3.9, 3.11, 3.12, 3.14, 3.16, 3.18 – 3.23, 3.25, 3.26. Annex A Table 4: 4.2, 4.4, 4.6, Annex A Table 5: 5.1, 5.2, 5.4, 5.6, Annex A Table 6: 6.1 – 6.3, Annex A Table 7: 7.1, 7.3, 7.4, 7.6, 7.9, Annex A Table 8: 8.2, 8.4-8.6, Annex A Table 9: 9.6, 9.8, 9.9)
Essex County Council	Sections 4.3, Section 4.13, Section 5 and Section 6 (see the table below for detailed responses to paragraphs 4.3.42, 4.3.44, 4.13.20, 4.13.21, 4.13.25, 4.13.27, 4.13.28, 4.13.36 – 4.13.41, 4.14.8, 5.3.8 – 5.3.11, 5.7.13, 6.16.5, 6.16.6, 6.19.1, 6.22.5)
Thurrock Council	Section 6.4, Section 6.16 and Annex A (see the table below for detailed responses to paragraphs 6.4.28, 6.4.29, 6.4.31 – 6.4.34, 6.4.46 – 6.4.49, Annex A 7.0)
South Norfolk District Council	Paragraphs 3.1.1 – 3.1.2, Section 8.1, Section 9 and Section 10.3 (see the table below for detailed responses to paragraphs 8.1.3 – 8.1.5, 9.2.3, 10.3.1, 10.3.2)
Tendring District Council	Section 15 (see the table below for detailed responses to paragraphs 15.6, 15.7, 15.9 – 15.15, 15.17 – 15.21)
Colchester City Council	Section 10 (see the table below for detailed responses to paragraphs 10.62, 10.81, 10.86, 10.104, 10.106)
Braintree District Council	Section 10 (see the table below for detailed responses to paragraphs 10.3.2, 10.5.5, 10.5.7, 10.5.8, 10.5.22, 10.5.28, 10.6.5, 10.6.7 – 10.6.12, 10.8.17 – 10.8.22, 10.9.1, 10.9.2, 10.10.1, 15.4.4, 10.4.5)
Chelmsford City Council	Paragraphs 8.165 to 8.282 and Section 10 (see the table below for detailed responses to paragraphs 8.199, 8.201, 8.204, 8.205, 8.207 – 8.210, 8.238, 8.244, 8.245, 8.250 – 8.282, 10.14, 10.15)
Brentwood Borough Council	Section 2 and Paragraphs 4.48 – 6.55 (see the table below for detailed responses to paragraphs 2.61, 6.49, 6.50 – 6.52)

- 4.9.5** The Applicant has engaged extensively with Local Authorities on matters relating to historic environment. This is reported in detail in Statements of Common Ground (SoCGs) (see Table 1.1 for Examination Library references). Within the SoCGs, matters are categorised as Agreed, Not Agreed or Under Discussion.
- 4.9.6 Each SoCG includes a table listing each environmental topic chapter in the Environmental Statement. Under each environmental topic chapter subheading, are a list of seven categories which are aligned with how the Environmental Impact Assessment was undertaken.
- 4.9.7 The bullet points below (split by category) provide a summary of where agreements are currently up to with the host Local Authorities relating to Historic Environment (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG).
- Matters relating to EIA – Regulatory, Planning Policy Context and Guidance are agreed with ten out of twelve Local Authorities.
 - Matters relating to EIA – Approach and Methods are agreed with nine out of twelve Local Authorities
 - Matters relating to EIA – Baseline Conditions are agreed with nine out of twelve Local Authorities
 - Matters relating to EIA – Embedded, Standard and Additional Mitigation Measures are under discussion with ten out of eleven Local Authorities. This topic is not applicable for South Norfolk Council.
 - Matters relating to EIA – Assessment Conclusions are agreed with eight out of twelve Local Authorities
 - Matters relating to Draft DCO / Outline Management Plans / Mitigation and Monitoring are under discussion with ten out of twelve Local Authorities.
 - Other matters related to the Historic Environment are agreed with eight out of twelve Local Authorities.

4.9.8 The table below reflects the category (agreed, under discussion, not agreed), most frequently recorded across the SoCGs for each of the 13 Local Authorities relating to Historic Environment (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG).

Image 4.5 Historic Environment - Categorisation of Matters in Statements of Common Ground

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Condition	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring	Other matters as required
Norfolk County Council	Agreed	Agreed	Agreed	Agreed	Agreed	Agreed	Agreed
Suffolk County Council	Agreed	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion
Essex County Council	Under discussion	Agreed	Agreed	Under discussion	Agreed	Under discussion	Agreed
Thurrock County Council	Agreed	Agreed	Agreed	Under discussion	Agreed	Under discussion	Agreed
South Norfolk Council	Agreed	Agreed	Agreed	Not applicable	Agreed	Agreed	Under discussion
Babergh and Mid Suffolk Councils	Agreed	Agreed	Agreed	Under discussion	Under discussion	Under discussion	Under discussion
Tendring District Council	Agreed	Agreed	Agreed	Under discussion	Agreed	Under discussion	Agreed
Colchester City Council	Agreed	Agreed	Agreed	Under discussion	Agreed	Under discussion	Agreed

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Condition	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring	Other matters as required
Braintree District Council	Agreed	Agreed	Agreed	Under discussion	Agreed	Under discussion	Agreed
Chelmsford City Council	Agreed	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Agreed
Brentwood Borough Council	Under discussion	Agreed	Agreed	Under discussion	Agreed	Under discussion	Agreed
Basildon Borough Council	Agreed	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion

Responses to New Matters and Applicant Clarifications

- 4.9.9 The table below sets out the Applicant's response to the matters raised in the Local Impact Reports that the Applicant previously has not addressed in their documents, including Statements of Common Ground with Local Authorities or in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**.

Table 4.16 Historic Environment – Responses to new matters and Applicant clarifications

ID	Stakeholder	Comment	NG Response
7.28	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	The development, including pre-commencement and construction, has the potential to damage or destroy archaeological heritage assets within the Order Limits. In line with the Overarching National Policy Statement for Energy ("EN-1"), the Applicant must assess the significance of heritage assets, avoid harm where practicable, and set out proportionate mitigation (preservation in situ, targeted excavation, recording, archiving and dissemination). Full archaeological evaluation (geophysical survey, trial trenching, geoarchaeological and palaeoenvironmental assessment) remains outstanding for substantial parts of the scheme. To date, only areas defined by the applicant as "priority areas" have been archaeologically investigated, and these also require further work to inform appropriate archaeological mitigation.	The archaeological evaluation work (geophysics and trial trenching) is ongoing, continuing the Applicant's commitment to the historic environment potentially affected the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as Supplementary Environmental Information which Suffolk County Council is aware of. At this stage approximately 3,000 trial trenches and 1,650 ha of geophysical survey have been completed. The Phase 2 stage of the geophysical survey and trial trenching has continued in 2026, and all the results of this work will be shared with the Local Planning Authority Archaeological Advisors (LPAAA) for approval as discussed at monthly meetings and set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] . The vast majority of the priority geophysical survey and trial trenching are complete and included in the Supplementary Environmental Information Report. The fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to

ID	Stakeholder	Comment	NG Response
			determine consent by the Planning Inspectorate and the Secretary of State.
7.38	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	To prevent irreversible loss, any intrusive decommissioning activity must be preceded by targeted archaeological assessment and carried out only under an agreed Written Scheme of Investigation with appropriate archaeological supervision, recording, analysis and deposition arrangements. These requirements should be secured in the DCO and the decommissioning plan so that any future interventions are managed, funded and consented to protect the historic environment.	Decommissioning has been scoped out of the assessments as set out in 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297] .
7.42	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	SCCAS also require robust post-excavation and archiving commitments, and the production and approval of an Updated Project Design ("UPD"), to be informed by the Post-Excavation Assessment reports ("PXA"), that sets out timeframes for completing the full analysis and confirms secured funding for full specialist post-excavation analysis, publication, archive deposition and dissemination of results. SCCAS further recommends stronger provision for training, monitoring, and public outreach, and confirmation that live constraints mapping will be used. The final AMS-OWSI, all subsequent DWSIs and contractor method statements, and the UPD must be approved in writing by the relevant Local Planning Authority Archaeological Advisors ("LPAAA").	The Applicant will update 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] during the examination period in consultation with the Local Planning Authority Archaeological Advisors, as discussed and agreed at regular monthly meetings with the Local Planning Authorities and Historic England and will consider any detailed comments provided in Local Impact Reports.
7.47	Suffolk County Council, Babergh District Council	Additionally, the mitigation measures set out in the Historic Environment Assessment Tables (document 6.11.A2) are inadequate to address the likely impacts	6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] is not intended to provide the full detail of mitigation

ID	Stakeholder	Comment	NG Response
	ct Council, Mid Suffolk District Council	of this scheme and risk avoidable and irreversible harm to the historic environment. This would be inconsistent with EN-1, which requires that both direct and indirect impacts are identified and understood and that harm is avoided or minimised through design and mitigation, with any justified loss of archaeological assets preserved by record. Given the route's passage through multiple, distinct East Anglian landscapes, there is a realistic potential for previously unknown heritage assets of local to national significance, which is not accommodated for when assessing the HER data. Accordingly, the assessment tables must set out the requirement for a full programme of archaeological evaluation, including geophysical survey, trial trenching, and where relevant geoarchaeological and palaeoenvironmental assessment, to establish presence, extent, character and significance of archaeological heritage assets and to inform design and mitigation measures.	measures, it signposts where a physical impact to archaeology is expected and therefore where archaeological mitigation would be required. The details of mitigation are contained in 7.2 Outline Code of Construction Practice [Revision B] , 7.4 Outline Landscape and Ecological Management Plan [Revision C] and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and secured through the relevant requirements in 3.1 Draft Development Consent Order [APP-056] .
8.37 – 8.39	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	Draft Development Consent Order (DCO) Article 5 (Limits of Deviation) - The Order Limits are generally 100 m wide for the proposed overhead line (50 metres either side of the centre line of the proposed overhead line). There are concerns regarding the lateral, longitudinal (horizontal) and vertical limits of deviation set out in Article 5 of the Draft DCO with regards to the potential worsening of temporary (construction) and permanent impacts on the setting and significance of heritage assets to those set out in the Applicant's Environmental Statement assessments (which are based on the	The Limits of Deviation (LoD) are a normal feature of Nationally Significant Infrastructure Project (NSIP) developments and represent the allowed maximum deviation for permanent features, such as the overhead line, pylons, Cable Sealing End (CSE) compounds, underground cables and new substations. This allows for adjustment to the final positioning and height of Project features to avoid localised constraints or unknown or unforeseeable issues that may arise. Table 4.3 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] outlines the details of the LoD sought and therefore assessed within the Environmental Statement, which is secured by Article 5

ID	Stakeholder	Comment	NG Response
		Works Plan (document 2.3), Figure 4.1 Proposed Project Design (document 6.4.F1) and 4.2 Project Design – Permanent Features (document 6.4.F2). The limits of deviation could bring pylons and overhead lines up to 50 metres closer to heritage assets (laterally) and allow movement anywhere along the line of the project (longitudinally), exacerbating their detracting visual impacts. Pylons may also be of an additional height of up to 6 metres from the pylon design heights set out in the Works Plan, and up to 18 metres for certain pylons where it is necessary to allow a change from proposed low height pylons to standard height pylons. Article 5 also sets out horizontal limits of deviation for other permanent above ground structures, erections and apparatus including substations and sealing end compounds such that they may be located anywhere within the parameters shown by the pink dashed lines on the Works Plans. They may also be up to 10% above the maximum height shown on the table of parameters forming part of the Works Plans (and may also be any amount lower in height as the undertaker considers convenient). The limits of deviation are of particular potential concern with regards to the designated heritage assets listed below, which are in closest proximity to the Order Limits and where a Mid-level of Less than Substantial Harm (“LTSH”) to their significance has been identified by the Applicant at the Operation and Maintenance phase of the project. NB These are provided as examples and are not intended to be an exhaustive list of all assets where there are potential concerns with regards to the limits of deviation. There	and Requirement 4 of 3.1 Draft Development Consent Order [APP-056]. Much of the design set out in the application is for reasons of proportionality and timing of a preliminary or indicative nature, and 3.1 Draft Development Consent Order [APP-056] therefore allows flexibility in terms of location, detailed design and construction methods which is still to be confirmed by the relevant contractors. The assessment presented within Section 11.7 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], 6.11.A2 Environmental Statement Appendix 11.2 Historic Environment Assessment Tables [AS-070] and 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] has been undertaken on the design shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] and 6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134]. ‘Sensitivity testing’ has been undertaken to determine if changes to the design within the LoD would affect the assessment, as set out in Section 11.9 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Alternative locations could change the assessment for the historic environment in relation to physical impacts and impacts through change to setting that affect the value of a heritage asset. While alternative locations within the LoD have been considered, the Environmental Statement assessment comprehensively accounts for the reasonable worst-case physical and setting impacts on

ID	Stakeholder	Comment	NG Response
		is the potential for designated heritage assets that have been assessed as having a Low level of LTSH to their significance to experience a mid level of LTSH due to pylons, overhead lines and other permanent above ground structures being located in closer proximity within the lateral and longitudinal limits of deviation.	heritage assets. Therefore, no significant effects beyond those reported in the ES residual effects section are anticipated due to alternative pylon locations or adjustments within the LoD. The Study Areas for Historic Environment are set from the Order Limits and therefore the baseline accounts for the LoD. The LoD was reviewed and in particularly sensitive locations for heritage assets specific commitments are set out in 7.2 Outline Code of Construction Practice [Revision B] to restrict the longitudinal LoD. The assessment in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and its appendices has considered the reasonable worst-case potential effects of locating pylons or conductors anywhere within the LoD and has considered the potential effects of a vertical increase in height of up to 6 m from the pylon design heights presented within 2.3 Works Plans [APP-017 – APP-024] .
8.54	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	The Councils recommend that the standard mitigation measures are further expanded to clarify the definitions of ‘appropriate’ replacements, and ask for the relevant local authorities to be contacted before such elements are removed, in order to discuss the manner of replacement as well as the extent of any removals of fences, walls, etc.	The term ‘appropriate’ in this context refers to the reinstatement of landscape features (such as hedgerows, fences, walls, and earthworks) in a manner that is sensitive to the local character, setting, and historic significance of the area. The general approach and reinstatement plans can be found in Section 9 of 7.4 Outline Landscape and Ecological Management Plan [Revision C]. Specifically, this means: • Replacement features will be of a similar type, scale, and material to those lost, wherever possible, reflecting the character and function of the original feature • Design and siting will be informed by local landscape character assessments, historic

ID	Stakeholder	Comment	NG Response
			environment records, and, where relevant, consultation with Local Planning Authorities and heritage specialists • Species selection for replanting (e.g. hedgerows) will seek to match historic or locally appropriate species mixes, and construction/restoration of walls or banks will use traditional techniques and materials where feasible • If retention of a feature is not possible, the replacement or reinstatement will be designed to ensure that the heritage, ecological, and landscape value is maintained or, where possible, enhanced.
8.55	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	Following our review and assessment of the Applicant's conclusions on the impacts of the project on heritage assets, for each designated heritage asset where a Mid-Level of less than substantial harm has been identified to its significance at the Construction phase of the project the Councils would request further details are provided by the Applicant regarding the mitigation measures that have been employed, for example, the selected locations of haul roads and other aspects of construction related activity and infrastructure and whether or what, if any, alternatives were assessed prior to the submitted project design.	Where a mid-level less than substantial harm conclusion has been reached for the construction phase impacts in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] , these impacts would be temporary, and the construction related elements of the Project would be reinstated following completion of construction. Therefore, it is not considered necessary to microsite all temporary elements of the works. However, 5.15 Design Development Report [APP-122] provides an explanation of the main changes in the route alignment, infrastructure siting and technology incorporated into the Project following review and consideration of the feedback received to the 2024 statutory consultation and to the targeted statutory and non-statutory consultations held in 2025. Changes to temporary construction works were considered as part of this. 5.15 Design Development Report [APP-122] addresses the main changes requested and those

ID	Stakeholder	Comment	NG Response
			changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors.
Table 15, 15a	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	Construction Phase Impacts Detrimental impact to PROW - PROW are both historic and living features that are part of the landscape, and need to be assessed as such in order to identify appropriate treatment. Required mitigation Reassessment to ensure that PROW as historic and living features of the landscape have been appropriately captured and mitigated for.	PRoW are not considered as part of the historic environment assessment, in accordance with the scope agreed in 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] and through regular engagement with historic environment stakeholders throughout the pre-application stage of the Project. The Landscape and Visual Impact Assessment (LVIA) in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] considers the effect of the Project on the visual amenity of people using PROW. This is in accordance with the approach set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227], which is in line with professional guidance in the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) and Clarification Notes. The LVIA does not consider PROW as features in their own right.
Annex A Table 1, comment 1.1	Suffolk County Council, Babergh Distri	6.9.A4 ES Appendix 9.3 – Hydrological Risk Assessment [APP-185]	Geoarchaeological monitoring of Ground Investigation works at the Stour Valley took place prior to submission and the results of this work, including a

ID	Stakeholder	Comment	NG Response
	ct Council, Mid Suffolk District Council	Determination of the Stour River crossing suitability must be informed by a full geoarchaeological and palaeoenvironmental assessment to guide project design and to evaluate the feasibility of horizontal directional drilling (HDD), pipe-jacking, or direct-buried pipe installation. These assessments should create a detailed deposit model for the river valley and characterise subsurface stratigraphy, palaeochannels, sediment stability, groundwater conditions, and archaeological significance and sensitivity so that the most appropriate construction method can be selected and the archaeological resource can be identified, avoided, or mitigated effectively.	deposit model, is included in 6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]. The results revealed a sequence of natural geological layers with no archaeological deposits identified. Provision for further geoarchaeological work is included in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], which will be updated in consultation with Local Planning Authority Archaeological Advisors to consider any detailed comments provided in Local Impact Reports. Commitment GH11 in 7.2 Outline Code of Construction Practice [Revision B] secures the requirement for a Hydrogeological Risk Assessment to be undertaken at all trenchless crossing locations, which would include the River Stour crossing.
Annex A Table 2, comment 2.1	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	SCCAS recommend that the Historic Environment Baseline Report (HEBR) (Document 6.11.A1) for archaeology must go beyond a simple inventory of Historic Environment Record (HER) entries and provide a structured assessment of archaeological potential to evaluate the likelihood of project impacts encountering currently unknown heritage assets of unknown significance.	6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] has been produced in accordance with industry standard guidance (CIFA (2014) Standard and guidance for historic environment desk-based assessment) and the Applicant considers it to be fit for purpose. Whilst there is no 'Archaeological Potential' section within 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] the archaeological potential of the Project is considered throughout the baseline narrative, which includes discussion about the nature of the archaeological resource along the route by location and period. This is essential in aiding the understanding of the nature of human activity since the

ID	Stakeholder	Comment	NG Response
			prehistoric period, the evolving nature of settlement and exploitation of the landscape, the way in which past communities have harnessed local resources and consequently the way in which surviving archaeological remains reflect these activities. This methodology is set out in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] .
Annex A Table 2, comment 2.6	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	Based upon current information within the County Historic Environment Record, the proposed construction laydown area, east of Wortham (located north of Lion Road grid ref 610100,277750) lies near recorded archaeological heritage assets of potential regional to national significance (Historic Environment Baseline Report number 2164). SCCAS therefore recommends an upfront archaeological evaluation to establish the presence, absence, significance, extent and depth of archaeology within the laydown area, as such remains could form a constraint upon development.	The Applicant has identified this construction laydown area as 'Area 162 - North of Lion Rd, south-west of Palgrave (west of RG93)'. The site has been subject to geophysical survey with only a field boundary, a pond and ploughing trends identified. Archaeological trial trenching is planned, and a trench array has been designed and will be shared with the archaeological advisor for agreement.
Annex A Table 2, comment 2.7	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	This needs to be amended to state that: <i>"....no further known non-designated heritage assets. There remains, however, a potential for additional archaeological heritage assets to be identified through ongoing and future archaeological investigation."</i>	The Applicant acknowledges the Council's suggestion to amend paragraph 11.7.114 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] . However, the current wording reflects a proportionate and robust assessment based on the extensive archaeological evaluation completed to date. A substantial programme of archaeological evaluation (geophysical survey and trial trenching) has been undertaken and remains ongoing. To the end of December 2025, approximately 3,000 trial trenches and 1,650 ha of geophysical survey had been completed; the results to that date were submitted to

ID	Stakeholder	Comment	NG Response
			the Planning Inspectorate in January 2026 as Supplementary Environmental Information (SEI), and Suffolk County Council have been made aware of this information. The vast majority of the priority geophysical survey and trial trenching areas are complete and are included within the SEI. The approach taken is proportionate to the importance and likely significance of the assets and exceeds the level of field evaluation often completed for comparable nationally significant infrastructure projects. Where further uncertainty remains, the Applicant has a clear and agreed programme for further work and mitigation. Phase 2 evaluation is underway in 2026 and all subsequent results will be shared with the Local Planning Authority Archaeological Advisors for review, in accordance with the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. Accordingly, the Applicant considers the existing text appropriately reflects the current evidence base and a proportionate position on non-designated assets.
Annex A Table 3, comment 3.1	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	There are 3452 uses of the term “evidential value” does this equate to archaeological value?	Yes, it follows the approach in Conservation Principles, Policies and Guidance (Historic England 2008: 28), which defines evidential value thus: <i>‘35 Evidential value derives from the potential of a place to yield evidence about past human activity.</i> <i>36 Physical remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them. These remains are part of a record of the past that begins with traces of early humans and continues to be created and destroyed. Their evidential</i>

ID	Stakeholder	Comment	NG Response
			value is proportionate to their potential to contribute to people's understanding of the past. 37 In the absence of written records, the material record, particularly archaeological deposits, provides the only source of evidence about the distant past. Age is therefore a strong indicator of relative evidential value, but is not paramount, since the material record is the primary source of evidence about poorly documented aspects of any period. Geology, landforms, species and habitats similarly have value as sources of information about the evolution of the planet and life upon it. 38 Evidential value derives from the physical remains or genetic lines that have been inherited from the past. The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement.'
Annex A Table 3, comment 3.2	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	Table A11.1.1 Heritage value assessment criteria The assessment criteria for heritage value differs when considering archaeological potential. Asset value is often rated lower where no archaeological investigations have been carried out or where individual finds have been recorded in the HER, or from contributions to the Portable Antiquity Scheme (PAS) etc. The baseline should therefore state clearly that the mapped heritage assets within the Order Limits do not represent the full archaeological resource, and that areas beyond recorded sites may contain as yet unidentified remains from all periods, with currently unknown significance, which have the potential to be impacted by the scheme	Value has been assigned following the methodology in 6.19 Scoping Report [APP-288 - APP-296], 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209], and 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and using relevant guidance and professional judgement. It is not proposed to make changes to the agreed methodology at this stage.

ID	Stakeholder	Comment	NG Response
Annex A Table 3, comments 3.5/ 3.7/ 3.8/ 3.9/ 3.12/ 3.14/ 3.16/ 3.18/ 3.19/ 3.20/ 3.21/ 3.22/ 3.25	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	Annex Table 3 comments on values assigned to heritage assets. Comments regard the valuation given in the Baseline Report to be too low.	Value has been assigned following the methodology outlined in 6.19 Scoping Report [APP-288 - APP-296] , 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] , and 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and using professional judgement. Cropmarks were not taken as conclusive evidence of function and date unless particularly persuasive or supported by evaluation/ excavation results or notable concentrations of artefacts. The Applicant is confident in the heritage valuations given in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] but acknowledges that value could be considered higher or lower based on the findings of geophysical survey and intrusive fieldwork.
Annex A Table 3, comment 3.9	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	“Based on satellite imagery, the site was stripped in 2019/2020 and fell within a former works compound but there is no known record of archaeological investigation.” Archaeological work on this site has been undertaken as part of the East Anglia One Offshore Wind Farm - NSIP project (HER number: BRF 130) ESF25149. The excavation revealed seven phases of activity: two tentatively prehistoric, four medieval, and one probably postmedieval. The most significant finds were evidence of Anglo-Saxon farming and two 11th–12th century tofts. These medieval features are likely linked to the settlement and field systems recorded at EA1 sites 1 and 2 to the west and north of Area 3, together indicating a dispersed medieval settlement historically known as Bullen (Bullen Green).	The Applicant thanks the Council for this information but as it was not included in any of the data sources identified in 6.19 Scoping Report [APP-288 - APP-296] and 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] at the point of data cut off for the application and is not located within the Order Limits, the Historic Baseline Report will not be edited to include this heritage asset.

ID	Stakeholder	Comment	NG Response
		This information should be included within the Early medieval section of the HEBR.	
Annex A Table 3, comment 3.11	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	These heritage assets of Roman and Anglo-Saxon date have the potential to meet the criteria for national significance and must be referenced in this section.	The methodology in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] equates the high value attributed to this asset, with national significance.
Annex A Table 3, comment 3.23	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	Paragraph 3.4.131 notes that additional cropmarks were identified during this assessment; SCCAS requests that the project provide geolocated shapefiles of these cropmarks so they can be incorporated into the HER.	The Applicant can supply SCCAS with all the cropmarks mapped by the Project in Suffolk in GIS shapefile format.
Annex A Table 3, comment 3.26	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	SCCAS cannot see where archaeological potential has been discussed beyond this table. The baseline should make clear that the mapped heritage assets within the Order Limits do not represent the full archaeological resource and that areas beyond recorded sites may contain as yet unidentified remains of all periods.	See Annex A Table 2, comment 2.1 above
Annex A Table 4, comment 4.2	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	6.11.A2 ES Appendix 11.2 – Historic Environment Assessment Tables Paragraph 11.1.1 Clarify in bullet point one that the definition of construction includes pre-commencement works.	The Applicant refers SCCAS to paragraph 4.7.2 bullet point 2 in 6.4 Environmental Statement Chapter 4 – Project Description [APP-130] where construction includes pre-commencement operations. The Applicant will not, therefore, make the suggested edit.
Annex A Table 4, comment 4.4	Suffolk County Council, Babergh	Table A11.2.11 Remove ambiguous wording, such as if required. Where there is a development impact archaeological	The use of the term ‘if required’ reflects the potential for an asset to be within the Order Limits but not located within an area of physical impact. Also, it may

ID	Stakeholder	Comment	NG Response
	District Council, Mid Suffolk District Council	evaluation will be required to inform an appropriate mitigation strategy. Where archaeological evaluation (geophysical survey and trial trenching) has not been undertaken, then the proposals for archaeological mitigation cannot be determined, as the impact upon archaeological heritage assets, and any further heritage assets which are currently unknown, cannot be determined. As a result, this table needs to clearly state that archaeological evaluation, both geophysical survey and trial trenching will be undertaken ahead of any groundworks associated with this development to inform an appropriate mitigation strategy for the heritage assets covered in this table, whether this be by design (preservation in situ/avoidance) or by excavation and recording. Where the table discusses mitigation for finds or finds spots that have been removed from a site, it proposes no mitigation measures. It is unclear as to whether this means (a) no further mitigation for the individual heritage asset, which would be correct as it has been removed from site and recoded, so there would be no further mitigation possible for that asset or (b) whether means no proposed archaeological mitigation for the area the findspot is recorded, as the heritage asset has been removed from the site. If it is the latter, this overlooks that these surface finds were displaced from their original contexts, meaning the source archaeological features are likely to remain within the development area. Consequently, there is the potential for the development to disturb previously unrecorded archaeological heritage assets and mitigation measures here should detail a	reflect the low value of the asset e.g. a post-medieval/modern field boundary recorded on 20th century OS mapping. The use of 'if required' reflects the Applicant's intention to consider the requirement for mitigation on a case-by-case basis across the Order Limits.

ID	Stakeholder	Comment	NG Response
		programme of full archaeological evaluation (geophysical survey and trial trenching) which will inform on appropriate archaeological mitigation.	
Annex A Table 4, comment 4.6	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	‘2009’ – The cropmark currently recorded as a Neolithic long barrow should be treated as a high value heritage asset. Long barrows are rare in Suffolk and are normally components of wider Neolithic landscapes and later focal activity; they should not be assessed in isolation. Mitigation must consider the entire extent of the monument and recognise that, as burial monuments, long barrows may contain human remains which require specific archaeological and legal safeguards. Archaeological evaluation would need to be undertaken to inform on the presence/absence, character, extent, depth and significance of the archaeological heritage asset, which would inform appropriate mitigation. Should this heritage asset be shown to be a Neolithic long barrow its significance would warrant full excavation and recording, partial excavation and recording of a heritage asset of this significance would not be acceptable.	Value has been assigned following the methodology outlined in 6.19 Scoping Report [APP-288 - APP-296], 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209], and 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and using professional judgement. Cropmarks were not taken as conclusive evidence of function and date unless particularly persuasive or supported by evaluation/ excavation results or notable concentrations of artefacts. The Applicant is confident in the heritage valuations given in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] but acknowledges that value could be considered higher or lower based on the findings of geophysical and intrusive fieldwork. In the case of asset 2009, the HER record describes it as a ‘possible long barrow’ and with no further corroborative evidence the Applicant considers the reported value to be acceptable. Furthermore, and to address SCCAS concerns regarding evaluation and mitigation, the supplied HER polygon straddles the existing Bullen Lane, and Bullen Lane is located within the Order Limits as primary access route. The primary access route in the location of the HER poly will not result in any physical impacts, therefore, neither evaluation nor mitigation is required.
Annex A Table 5,	Suffolk County Council,	Update document to interim report throughout	The Applicant does not propose to edit the geophysical survey report referred to in Annex A Table 5 as this

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comments 5.1/ 5.2/ 5.4/ 5.6	Babergh District Council, Mid Suffolk District Council	This should have a statement that clearly sets out the limitations of magnetometer surveys label every figure with its corresponding development section	report is superseded by the most recent report submitted in January 2026 - 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report [AS-072 - AS-077] .
Annex A Table 6, comments 6.1 – 6.3	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	6.11.A5 ES Appendix 11.5 – Trial Trenching Results Report [APP-213] The document title should be amended to Interim Trial Trenching Results Reports for the Priority Areas. This change will ensure a clear distinction between this interim submissions, which do not provide full assessment of the results, and the subsequent full trial trenching reports, which will be submitted for review and approval by the relevant Local Planning Authority Archaeological Advisors. This needs to clearly state that this is an interim report of the priority areas only and it will be followed by a full trial trenching reports with full assessment of results, which will be submitted to the Local Planning Authority's Archaeological Advisor for comment and approval, and inclusion in the relevant County Historic Environment Record. Full results will inform appropriate mitigation strategies. The interim report needs to clearly set out how the ongoing trial trenching results of the priority areas will be integrated into this interim report or submitted during the examination.	The Applicant does not propose to edit the interim archaeological reports referred to in Annex A Table 6 as many of them have been, or soon will be, superseded by full assessment reports. Further assessment reports and interim reports were submitted in January 2026 (6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [AS-078]) and more will follow as they are produced by the archaeological contractor, and shared with SCCAS for approval.
Annex A Table 7 comment 7.1	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	7.2 Outline Code of Construction Practice (oCoCP) [APP-300] This bullet point (2.2.2) should also include archaeological mitigation measures to ensure that the protection and mitigation of archaeological heritage	Archaeological mitigation is included in pre-commencement activities in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] and are therefore already considered as part of this phase of works.

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	Suffolk District Council	assets is addressed during the pre-commencement phase of works. Early identification and mitigation of areas of development impacts are essential and must be secured through the AMS-OWSI and the Detailed Written Scheme of Investigation (DWSI), as appropriate.	
Annex A Table 7, comment 7.3	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	Management measures relating to archaeological heritage assets must be included in the Register of Environmental Actions and Commitments (REAC) to ensure they are tracked, implemented, and monitored throughout the lifecycle of the project. This includes mitigation strategies for both archaeological and palaeoenvironmental remains, which are particularly vulnerable in areas defined for preservation in situ or in areas of peaty or waterlogged soils.	The Applicant will not be producing a Register of Environmental Actions and Commitments for the Project.
Annex A Table 7, comment 7.4	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	Impacts on archaeology and palaeoenvironmental deposits must also be considered within the Hydrological Assessment. De-watering or changes to groundwater regimes can be highly destructive to sensitive deposits, especially those with the potential to preserve organic remains. Such impacts may result in irreversible loss of archaeological and palaeoenvironmental information. Therefore, hydrological modelling and mitigation strategies must be developed in consultation with the Historic England Regional Science Advisor and integrated into the wider environmental management framework.	6.9 Environmental Statement Chapter 9 – Contaminated Land, Geology and Hydrogeology [APP-181] concluded that neither groundwater levels nor groundwater receptors would be impacted by construction of above ground infrastructure, open cut trenching and trenchless crossing (paras 9.7.21 – 9.7.25). Therefore, it is concluded that groundwater levels beyond the Order Limits will not be impacted and by extension the environment of any potential archaeological remains will remain unchanged.

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Annex A Table 7, comment 7.6	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	H01 - Methodology and processes for archaeological mitigation is specified through the Outline AMS-OWSI (document reference 7.5) to be submitted with the DCO application. This should read: <i>“Methodologies and processes for further archaeological evaluation and mitigation are specified within the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMS-OWSI) (document reference 7.5). This document provides the framework for identifying, assessing, and managing archaeological heritage assets and will directly inform the production of Detailed Written Schemes of Investigation (WSIs) for specific areas or phases of the Project.”</i>	Commitment H01 in 7.2 Outline Code of Construction Practice [Revision B] to be issued at Deadline 2 is proposed to be updated to: <i>‘Methodologies and processes for further archaeological evaluation and mitigation are specified within the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMS-OWSI) (document reference 7.5). This document provides the framework for identifying, assessing, and managing archaeological heritage assets and will directly inform the production of Detailed Written Schemes of Investigation (WSIs) for specific areas or phases of the Project.’</i>
Annex A Table 7, comment 7.9	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	W06 Where a main river is crossed by a trenchless method (such as horizontal directional drilling or microtunnelling) the design of that crossing must take into account the potential for archaeological and palaeoenvironmental remains and their preservation. River valleys often contain deeply stratified and organic-rich deposits, including peat and alluvium, which may preserve significant archaeological and palaeoenvironmental evidence. To avoid disturbance or degradation of these sensitive deposits, the crossing design should be informed by appropriate geoarchaeological and palaeoenvironmental [sic] assessment and developed	The Applicant fully recognises the importance of safeguarding archaeological remains and our approach is aligned with this principle. The approach set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and secured through Requirement 5 within 3.1 Draft Development Consent Order [APP-056] already includes provision for a range of evaluation and mitigation strategies, including geoarchaeological and palaeoenvironmental investigation. 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], which will be updated in consultation with Local Planning Authority Archaeological Advisors to consider

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		in consultation with the Historic England Regional Science Advisor. This will ensure that the methodology is proportionate and aligned with best practice	any detailed comments provided in Local Impact Reports.
Annex A Table 8, comment 8.2	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [APP-303] Decompaction methodologies have the potential to impact archaeological heritage assets. Where decompaction is proposed, archaeological considerations must inform the design of an appropriate mitigation strategy.	Included in 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303] is reference to the requirement for the final SRP to include details of how areas with potential archaeology will be managed and considered during reinstatement. Where soil reinstatement is required this will be a result of these areas having been stripped of topsoil (and potentially subsoil); as such it is expected that any required archaeological investigation/mitigation will already have been put in place.
Annex A Table 8, comments 8.4 – 8.6	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	Paragraph 1.9.36 This paragraph should also include that Peat deposits are an important source of palaeoenvironmental and archaeological information. The proposed development within these areas must be informed by appropriate geoarchaeological and palaeoenvironmental assessment to guide design and mitigation strategies. The assessments, design and mitigation strategies should be designed in consultation with the Historic Environment Regional Science Advisor and the relevant local authority archaeological advisor to ensure they are proportionate. Peat deposits in the Suffolk River Valleys are typically interbedded with alluvial and/or inundation layers, often forming complex, laminated sequences. The	It is proposed to update 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [APP-303] with additional text. The current text of paragraph 1.9.36: <i>‘Peatlands will often support or have the potential to support a range of sensitive habitats and species’</i> The following text will be added: <i>‘Peat deposits are an important source of palaeoenvironmental and archaeological information. The interpretation of the stratigraphy of these deposits can be challenging, requiring specialist input to ensure accurate stratigraphic reconstruction. The peaty soil mitigation strategy will be designed with full consideration of potential archaeological impacts and will be developed in consultation with the relevant Local Authority</i>

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		separation and interpretation of these deposits can be challenging, requiring specialist input to ensure accurate stratigraphic reconstruction. The peaty soil mitigation strategy must be designed with full consideration of potential archaeological impacts. This strategy should be developed in consultation with the relevant Local Authority Archaeological Advisor and Historic England Regional Science Advisor to ensure that any mitigation is appropriate, proportionate, and informed by current best practice in geoarchaeological and palaeoenvironmental assessment.	<i>Archaeological Advisor and Historic England Regional Science Advisor.'</i>
Annex A Table 9, comment 9.6	Suffolk County Council, Babergh District Council, Mid Suffolk District Council	7.4 Outline Landscape and Ecological Management Plan [APP-321] SCCAS notes that clay breakouts from proposed HDD river crossings of the Stour could cause significant environmental harm, and any mitigation for drilling clay breakouts must explicitly consider archaeological impacts.	The Applicant acknowledges the potential risks posed by clay breakouts during Horizontal Directional Drilling (HDD) river crossings of the Stour, including both environmental and archaeological impacts. Mitigation measures are secured through commitments GH11 and GH12 in 7.2 Outline Code of Construction Practice [Revision B], which require the development of detailed drilling fluid breakout method statements and mitigation plans, informed by appropriate ground investigations. In addition, a specific commitment within 7.2 Outline Code of Construction Practice [Revision B], commitment B26, specifically commits to a trenchless crossing method statement and contingency plan for the River Stour crossing by the Main Works Contractor(s), once detailed design is available.
Annex A Table 9,	Suffolk County Council, Babergh District Council, Mid	Archaeology needs to be a consideration for displacement of Water Voles.	The impacts of ecological mitigation on archaeology are included in assessment in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] and will be mitigated in

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comments 9.8 – 9.9	Suffolk District Council	The project needs to understand the archaeological implications of their removal. As the survival of veteran trees tend to relate to survival of historic parkland or historic boundaries.	accordance with 7.2 Outline Code of Construction Practice [Revision B] and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. Details for ancient woodland and veteran trees is contained within 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323] – monitoring programme for veteran trees will cover a minimum 30-year period. Impacts to veteran trees are currently reported as worst-case and will be reviewed during detailed design to determine if impacts can be further avoided. Paragraph 8.2.3 of 7.4 Outline Landscape and Ecological Management Plan [Revision C] confirms that, following detailed design and prior to construction, relevant surveys will be undertaken to reduce removal of trees/hedgerows as far as practicable, and this is recorded as commitment GG14 within 7.2 Outline Code of Construction Practice [Revision B]. Table 5.1 in the Ancient Woodland and Veteran Tree Strategy (7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]) details compensation measures. In the event that the veteran trees cannot be retained during the design stage, the compensation measures would also be agreed with landowners and detailed in the final LEMP.
4.3.42 /4.3.44	Essex County Council	A key design feature incorporated into the DHFMP is the retention of key views across the site, including those towards and between the Dunton Hills farmhouse, Church of All Saints and Church of St	The Applicant has considered alternative design solutions to position the pylon (which is to the west of the gas pipeline) further north or south. Either change requires an additional pylon and more directly reduces

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		Mary. In particular, development in the foreground and middle ground must not occlude the views of the Church of St Mary from the viewpoint to the east of the farmstead and preserve the viewers' ability to recognise and appreciate the landmarks. The retention of key views within the corridor, including those towards and between the Church of St Mary, just beyond the eastern boundary of the site so as to not occlude the view of the Church of St Mary from the development in the foreground and middle ground south-west of the site, is a key heritage design features incorporated into the Masterplan. However, the proposed alignment of the overhead powerline in the south east corner of DHGV would interrupt the safeguarded sightlines and adversely impact the view of the Church contrary to the stated design principle.	the area of development plots within the Dunton Hills Garden Village area. The historic environment assessment concluded a moderate adverse (significant) effect during construction and operation (and maintenance) phases for the grade II listed Church of St Mary (1122253) and Dunton Hall (1338380) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]) and a mid less than substantial harm conclusion for these listed buildings (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]). The assessment concluded no significant effects to other designated heritage assets in this area. The Applicant remains confident in the conclusions of the assessment given that the existing 132 kV PSC2-10 pylons would be removed and replaced with a smaller number of taller 400 kV pylons. Given the level of harm to the listed buildings does not constitute substantial harm, the Applicant's position is that this is not an unacceptable impact on the listed buildings.
4.13.20 - 21	Essex County Council	In addition, changes to the local water and burial environment could alter the preservation of archaeological sites within and beyond the development areas. Deeper impacts, such as at Horizontal Directional Drilling (HDD) locations and piling for pylon bases could impact geoarchaeological sediments.	Geoarchaeological monitoring of Ground Investigation works at three locations with high potential for geoarchaeological remains and potential impact from the Project took place prior to submission and the results of this work, including deposit models, are included in 6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]. Provision for further geoarchaeological work is included in the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of

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			Investigation [APP-328], which will be updated in consultation with Local Planning Authority Archaeological Advisors to consider any detailed comments provided in Local Impact Reports. The Applicant fully recognises the importance of safeguarding archaeological remains of national significance, and our approach is aligned with this principle. The approach set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and secured through Requirement 5 within 3.1 Draft Development Consent Order [APP-056] already includes provision for a range of evaluation and mitigation strategies, including preservation in situ, should highly significant remains be identified.
4.13.25	Essex County Council	Geophysical survey and archaeological trial trenching are currently ongoing. The first stage of geophysical survey for Priority Areas is largely complete. The ES chapter concludes that “the historic environment baseline presents a reasonable basis for assessment, but further information is forthcoming.” (AS-069 Section 11.4.32). It is agreed that the historic environment baseline provides a reasonable basis for known archaeological remains, however potential for further archaeological remains within the Order Limits has not been fully assessed through field evaluation and this information would be required to provide a more comprehensive basis for assessment.	The archaeological evaluation work (geophysics and trial trenching) has continued since the submission of the application for development consent, continuing the Applicant's commitment to the historic environment potentially affected by the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] to 6.11.F6 Environmental Statement Figure 11.6 - Phase 2 Geophysical Survey Preliminary Results [AS-083], of which the historic environment stakeholders are aware. At this stage approximately 3,000 trial trenches and 1,650 ha of geophysical survey have been completed. This information included further priority geophysical survey and trial trenching results, and

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			preliminary results of part of the Phase 2 geophysical survey. The Phase 2 stage of the geophysical survey and trial trenching will continue throughout 2026, and all the results of this work will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed at monthly meetings and set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. The vast majority of the priority geophysical survey and trial trenching are complete and included in the Supplementary Environmental Information. The fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State.
4.13.27 - 28	Essex County Council	Despite the adequacy of desk-based research and ongoing field evaluations, the level of information submitted with the application fails to provide sufficient information on the nature, extent and significance of heritage assets in order to determine the impact on archaeological remains by the proposed scheme. This is due to factors such as incomplete coverage of the non-Priority geophysical survey and trial trench evaluation across the scheme, lack of intrusive investigation to allow corroboration of the geophysical survey and cropmark data, and lack of full reporting	See response to 4.13.25.

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		on the trial trench evaluations that have been completed.	
4.13.36 - 39	Essex County Council	Due to incomplete evaluation of the scheme through intrusive methods and the limitations of the non-intrusive methods employed the archaeological potential of the proposed scheme is not fully understood to the required level, and previously unknown archaeological remains are likely to be present within the proposed scheme area. The risk of encountering high value heritage assets remains a significant risk. The assessment has followed the EIA methodology (APP-135) to determine the impact on archaeological remains listed in the Historic Environment Baseline Report (APP 209) and assigned values based largely on desk-based research. Establishing the 'value' and significance of below ground archaeological remains and deeply buried geoarchaeological deposits requires evaluation (geophysical survey, trial trenching, coring, and deposit modelling), as required by EN-1. For this reason, the 'value' of many of the archaeological remains listed is unsubstantiated and the assessment methodology cannot be effectively used on all of the assets listed in the historic environment baseline report. There is general agreement with the assessment of residual effects for archaeological remains of both designated and non-designated status where they are considered significant. However, without further information from the results of intrusive evaluation, the conclusions of the ES regarding what is significant in terms of residual effect cannot be fully	The results of the archaeological fieldwork have been used to inform the assessment of value of the archaeological assets assessed in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], this was undertaken for the assessment submitted with the DCO application and reviewed and, where appropriate, updated in assessment submitted as part of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] to 6.11.F6 Environmental Statement Figure 11.6 - Phase 2 Geophysical Survey Preliminary Results [AS-083]. See also response to 4.13.25. The value of the archaeological remains identified by the fieldwork was assessed and where appropriate the value determined by desk-based research was updated. This was included in the submission documents for fieldwork completed pre-submission and updated in the Supplementary Environmental Information (6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]).

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		determined. Specifically, those archaeological sites identified through cropmarks, finds scatters and geoarchaeological deposits. This information would be required to determine an appropriate mitigation strategy. In addition, without further evaluation in areas where there is no record of archaeological remains, the potential presence of heritage assets or their significance remains difficult to assess to the required level. Further intrusive assessment by trial trenching and geoarchaeological assessment would provide clarity on significance and reduces project risk.	
4.13.40	Essex County Council	A number of Protected Lanes have been identified within the Order Limits. Negative impacts are anticipated on their significance from construction; in order to provide access or for underground cabling. While reinstatement of any lost trees/hedgerow following the completion of construction will assist in offsetting this negative impact, more certainty is required about the recording and monitoring of this impact.	The 7.4 Outline Landscape and Ecological Management Plan [Revision C] includes measures to retain and reinstate historic landscape features including protected lanes, in addition to the commitment set out in H06 of 7.2 Outline Code of Construction Practice [Revision B]. Commitment H06 in 7.2 Outline Code of Construction Practice [Revision B] to be issued at Deadline 2 is proposed to be updated to: <i>‘Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). To support this approach, a topographic survey will be undertaken in advance of works/impacts to each Protected Lane (Essex) and Historic Lane (Suffolk) within the Order Limits, where likely to be affected by physical works. The survey will include mapping of any historic earthwork features associated with the Protected / Historic Lane, including associated banks and ditches. During construction, the contractor will</i>

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			<i>seek to limit the working area at the narrower sections of impacted lanes, to that which is practicable for the works to be delivered. Any historic features associated with the lane will be reinstated at the end of construction activities to the pre-work condition, including the reinstatement of hedgerow margins and historic earthworks. Where such features cannot be retained, compensatory design elements will be provided as appropriate (including hedgerows, fences, walls and earthworks).'</i> Also, see response to 6.16.5-6.
4.13.41	Essex County Council	Section 11.8.1 (AS-069) states that mitigation would be undertaken during pre-construction works or prior to the aspects of construction that would affect the heritage asset. This could include preservation in situ of archaeological remains, non-intrusive archaeological fieldwork and intrusive archaeological fieldwork. This should also specify geoarchaeological investigation to ensure any significant geoarchaeological remains have been identified prior to finalising the design for the trenchless crossings in the Stour Valley. The development would potentially result in a direct permanent and harmful change to a range of non-designated heritage assets. This would be a significant effect. The Applicants has provided information to inform the examination via the Historic Environment chapters of the ES. Further information and documents are however required to establish an appropriate programme of evaluation and mitigation for archaeology and geoarchaeology. This information is necessary to fully inform the decision-	A programme of archaeological evaluation has been discussed and agreed with Local Planning Authority Archaeological Advisors and Historic England, as set out in the relevant Statements of Common Ground (5.9 Draft Statement of Common Ground [APP-089 - APP-100 and APP-102]). All completed interim and assessment reports for geophysical survey and trial trenching were submitted with the application for development consent in 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey Results Report [APP-212] and 6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213] along with the reports of geoarchaeological and archaeological monitoring of ground investigation works (6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]). The archaeological evaluation work (geophysics and trial trenching) has continued since the submission of the application for development consent, continuing the

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		making process, and the planning balance as set out in the relevant policies.	Applicant's commitment to the historic environment potentially affected by the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] to 6.11.F6 Environmental Statement Figure 11.6 - Phase 2 Geophysical Survey Preliminary Results [AS-083], of which the historic environment stakeholders are aware. At this stage approximately 3,000 trial trenches and 1,650 ha of geophysical survey have been completed. This information included further priority geophysical survey and trial trenching results, and preliminary results of part of the Phase 2 geophysical survey. The Phase 2 stage of the geophysical survey and trial trenching will continue throughout 2026, and all the results of this work will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed at monthly meetings and set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. The vast majority of the priority geophysical survey and trial trenching are complete and included in the Supplementary Environmental Information. The fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State. The Project proposes to update 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] during

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			the Examination period in consultation with the Local Planning Authority Archaeological Advisors. The update and scope of the document will be informed by the findings of the ongoing fieldwork and the document will identify areas of Phase 2 archaeological trial trenching and areas where mitigation will be required. The approach set out in the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] already includes provision for further evaluation and a range of mitigation strategies, including further geoarchaeological work and preservation in situ should highly significant remains be identified.
4.14.8	Essex County Council	Paragraph 5.9.33 of the same document (<i>Overarching National Policy Statement for Energy (EN-1)</i>) requires that ‘in weighing applications that directly or indirectly affect NDHAs, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset’. The Applicant has not expressed impacts on built NDHAs specifically in terms of ‘harm to significance.’ Their assessment identifies whether any element of an asset would be physically impacted (lost/removed) by the project and assesses impact through change to setting that affects value for medium and high value non-designated heritage assets.	The assessment presented for non-designated heritage assets provides a scale of any impact in terms of magnitude of impact and significance of effect, as set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. 5.6 Planning Statement [APP-085] sets out the conclusions of assessment in relation to compliance with planning policy and the planning balance. The Project therefore considers that it has appropriately complied with relevant policy in Overarching National Policy Statement for Energy (EN-1)⁶¹ regarding assessment of impacts to non-designated heritage assets.
5.3.8 - 11	Essex County Council	Limits of Deviation (LoD). ECC notes that Article 5(1)(b)(i) would permit a vertical limit of deviation of 6 metres for the majority	The Limits of Deviation (LoD) are a normal feature of Nationally Significant Infrastructure (NSIP) developments and represent the allowed maximum

⁶¹ Department for Energy Security and Net Zero (2024) Overarching National Policy Statement for Energy (EN-1)

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		of the pylons. The Explanatory Memorandum (APP-057) explains that the rationale for the 6m limit is intended to provide a necessary but proportionate degree of flexibility. While noted, ECC is of the opinion this is a considerable extent of deviation, which as proposed, is not suitable for particularly sensitive areas such as nearby residential properties, in or nearby protected landscapes and nearby Grade 1 listed buildings, where the potential impact would potentially be greater than in other areas. The limits of deviation are of particular potential concern with regards to the following designated heritage assets which are in closest proximity to the Order Limits and where a Mid-level of Less than Substantial Harm (LTSH) to their significance has been identified by the Applicant at the Operation and Maintenance phase of the project. Colchester 1,2 & 3 Brick Cottages 1169966 Grade II The Old Rectory 1224447 Grade II King's Farmhouse 1266530 Grade II Knaves Farmhouse 1266773 Grade II Range South of Barn to South of Knaves Farmhouse (1266775) Grade I Barn to South of Knaves Farmhouse (1266822) Grade II Little Tey House (1266823) Grade II Barn to Southwest of Little Tey House (1266779) Grade II* Aldham Hall (1306270) Grade II*	deviation for permanent features, such as the overhead line, pylons, Cable Sealing End (CSE) compounds, underground cables and new substations. This allows for adjustment to the final positioning and height of Project features to avoid localised constraints or unknown or unforeseeable issues that may arise. Table 4.3 of Environmental Statement Chapter 4 - Project Description [APP-130] outlines the details of the LoD sought and therefore assessed within the Environmental Statement, which is secured by Article 5 and Requirement 4 of 3.1 Draft Development Consent Order [APP-056]. Much of the design set out in the application is for reasons of proportionality and timing of a preliminary or indicative nature, and 3.1 Draft Development Consent Order [APP-056] therefore allows flexibility in terms of location, detailed design and construction methods which is still to be confirmed by the relevant contractors. The assessment presented within Section 11.7 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], 6.11.A2 Environmental Statement Appendix 11.2 Historic Environment Assessment Tables [AS-070] and 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] has been undertaken on the design shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] and 6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134]. 'Sensitivity testing' has been undertaken to determine if changes to the design within the LoD would affect the

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		Wagon Lodge to North of Aldham Hall (1337391) Grade II Church of St Margaret and St Catherine (1170063) Grade II* Ford Street Conservation Area Tendring Bounds Farmhouse (1147743) Grade II Brentwood Stable and Coach House at Hutton House (1197242) Grade II Ingatestone Bridge over River Wid (1207790) Grade II Hutton House (1279616) Grade II Wardropers Farmhouse (1293259) Grade II Ellices (1297247) Grade II Hutton Village Conservation Area Basildon Sudbury's Farmhouse (1170946) Grade II Botney Hill Farmhouse (1197182) Grade II Wayletts (1121459) Grade II Church of St Mary (1170946) Grade II Dunton Hall (1338380) Grade II These properties are provided as examples and are not intended to be an exhaustive list of all assets where there are potential concerns with regards to the limits of deviation. There is the potential for designated heritage assets that have been assessed as having a Low level of LTSH to their significance during the operational phase to instead experience a	assessment, as set out in Section 11.9 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Alternative locations could change the assessment for the historic environment in relation to physical impacts and impacts through change to setting that affect the value of a heritage asset. While alternative locations within the LoD have been considered, the Environmental Statement assessment comprehensively accounts for the reasonable worst-case physical and setting impacts on heritage assets. Therefore, no significant effects beyond those reported in the ES residual effects section are anticipated due to alternative pylon locations or adjustments within the LoD. The Study Areas for Historic Environment are set from the Order Limits and therefore the baseline accounts for the LoD. The LoD was reviewed and in particularly sensitive locations for heritage assets specific commitments are set out in 7.2 Outline Code of Construction Practice [Revision B] to restrict the longitudinal LoD. The assessment in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and its appendices has considered the reasonable worst-case potential effects of locating pylons or conductors anywhere within the LoD and has considered the potential effects of a vertical increase in height of up to 6 m from the pylon design heights presented within 2.3 Works Plans [APP-017 – APP-024].

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		Mid-level of LTSH due to pylons, overhead lines and other permanent above ground structures being in closer proximity than the existing plans, due to the proposed lateral and longitudinal limits of deviation It is therefore proposed that the limit vertical deviation should be no more than 4 metres, (as per Bramford to Twinstead DCO, which is a more local, and thus more relevant development than the Yorkshire Green Energy Project, to which the Applicant refers in the Explanatory Memorandum). Anything beyond this 4 meters should require prior approval from the relevant planning authority	
6.16.5-6	Essex County Council	Outline Code of Construction Practice (CoCP) (APP-300) Historic Environment (archaeology) is covered under H01 to H05 of the CoCP, and are agreed as appropriate. However, in respect of H04 which considers when a previously unknown asset is discovered, or a known heritage asset has proved to be more significant than foreseen at the time of the application, the following statement should be added: <i>The Principal Contractor(s) will be responsible for making sure staff are aware of what to do in the event of an unexpected heritage asset. This should include toolbox talks within site inductions.</i> Mitigation for Protected Lanes is included under H06. In order to protect the historic features of protected lanes a permanent record should be completed prior to any changes which would allow for more accurate re-instatement. The requirement for this should be included under H06 and the mode and mechanism for this process included in the final Landscape and	Commitment H04 in 7.2 Outline Code of Construction Practice [Revision B] to be issued at Deadline 2 is proposed to be updated to include this additional wording: <i>‘The Principal Contractor(s) will be responsible for making sure staff are aware of what to do in the event of an unexpected heritage asset. This should include toolbox talks within site inductions.’</i> 7.4 Outline Landscape and Ecological Management Plan [Revision C] includes measures to retain and reinstate historic landscape features including protected lanes, in addition to the commitment set out in H06 of 7.2 Outline Code of Construction Practice [Revision B]. Commitment H06 in 7.2 Outline Code of Construction Practice [Revision B] to be issued at Deadline 2 is proposed to be updated to: <i>‘Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). To</i>

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		Ecological Management Plan (LEMP). It is noted that the measures proposed by the Applicant in their Bramford to Twinstead project (H05) included a more robust mechanism for their protection. It is recommended that this approach is adopted as set out below: <i>“A topographic survey will be undertaken in advance of construction of each Protected Lane (Essex) and Historic Lane (Suffolk) within the Order Limits where likely to be affected by physical works. The survey will include mapping of any historic earthwork features associated with the lane, including banks and ditches. During construction, the contractor will seek to limit the working area to the narrowest section of lane that is practicable for the works. Any historic features associated with the lane will be reinstated at the end of construction to the pre-work condition, including the replanting of hedgerows and reinstatement of historic earthworks.”</i>	<i>support this approach, a topographic survey will be undertaken in advance of works/impacts to each Protected Lane (Essex) and Historic Lane (Suffolk) within the Order Limits, where likely to be affected by physical works. The survey will include mapping of any historic earthwork features associated with the Protected / Historic Lane, including associated banks and ditches. During construction, the contractor will seek to limit the working area at the narrower sections of impacted lanes, to that which is practicable for the works to be delivered. Any historic features associated with the lane will be reinstated at the end of construction activities to the pre-work condition, including the reinstatement of hedgerow margins and historic earthworks. Where such features cannot be retained, compensatory design elements will be provided as appropriate (including hedgerows, fences, walls and earthworks).’</i>
6.19.1	Essex County Council	In document 6.14 Environmental Statement Chapter 14 - Noise and Vibration (APP-256) the Applicant has identified the potential for damage to a total of five buildings or structures due to construction vibration from potential compaction activities. Four of these are located in Section C (Tendring District) and include the Grade II listed War Memorial (List entry number 1493299). Directly adjacent to another of the four buildings identified (Haywain, The Haywain, Bentley Road, Little Bromley, CO11 2PL (grid reference 610156, 227908) (Section C) is the Grade II listed timber framed and weatherboarded Pair of Cottages. These are approximately 10 metres south of the Fox	The properties in question are located approximately 7m from proposed works. This is beyond the 2m threshold distance within which there is a potential non-zero risk of damage from vibratory compaction during highway works. The Haywain is located within approximately 1 m of the works location and is therefore identified as having a greater than zero risk and is therefore highlighted. The assessment presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] considers reasonable worst-case assumptions, and contractor will specify mitigation measures to reduce vibration

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		and Hounds Public House (List entry number 1111418) and it is unclear why this listed building has not also been identified as having the potential for damage. Without further explanation from the Applicant, it should be included.	levels. These measures would also reduce vibration levels at the properties to the south of The Haywain.
6.22.5	Essex County Council	The OLEMP (APP-321) includes measures to protect and reinstate historic landscape features including protected lanes, in addition to the commitment set out in H06 of the Outline CoCP (APP-300) which considers the maintenance of elements within the landscape. The plan does not include sufficient controls to ensure the accurate re-instatement of historic features should removal or changes be required during construction. The following should be added to Section 7.9 of the OLEMP to ensure there are sufficient controls in place: <i>‘Should removal of features, other than hedgerows, associated with the protected lane be required, such as banks, verges, earthworks, a suitable method of recording of all historic features associated with the protected lane should be carried out in order to facilitate accurate re-instatement.’</i>	Section 9.8 of 7.4 Outline Landscape and Ecological Management Plan [Revision C] already includes provision for reinstatement of protected lanes, include vegetation, earthworks and other boundary features and for pre-construction photographs to be taken to ensure a record is available to inform any reinstatement. Commitment H06 in 7.2 Outline Code of Construction Practice [Revision B] to be issued at Deadline 2 is proposed to be updated to: <i>‘Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). To support this approach, a topographic survey will be undertaken in advance of works/impacts to each Protected Lane (Essex) and Historic Lane (Suffolk) within the Order Limits, where likely to be affected by physical works. The survey will include mapping of any historic earthwork features associated with the Protected / Historic Lane, including associated banks and ditches. During construction, the contractor will seek to limit the working area at the narrower sections of impacted lanes, to that which is practicable for the works to be delivered. Any historic features associated with the lane will be reinstated at the end of construction activities to the pre-work condition,</i>

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			<i>including the reinstatement of hedgerow margins and historic earthworks. Where such features cannot be retained, compensatory design elements will be provided as appropriate (including hedgerows, fences, walls and earthworks).'</i>
6.4.28 - 29	Thurrock Council	The LoD included within the Draft DCO are a concern, due to how these will allow for movement and adaptation of the route as work commences. The Order Limits are generally 100 m wide for the proposed overhead line (50 metres either side of the centre line of the proposed overhead line). There are concerns regarding the lateral, longitudinal (horizontal) and vertical limits of deviation set out in Article 5 of the Draft DCO with regards to the potential worsening of temporary (construction) and permanent impacts on the setting and significance of heritage assets to those set out in the Applicant's ES assessments (which are based on the Works Plan (document 2.3), ES 'Figure 4.1 Proposed Project Design' (document 6.4.F1) and 'Figure 4.2 Proposed Project Design – Permanent Features' (document 6.4.F2). The LoD could bring pylons and overhead lines up to 50 metres closer to heritage assets (laterally) and allow movement anywhere along the line of the project (longitudinally), exacerbating their detracting visual impacts. Pylons may also be of an additional height of up to 6 metres from the pylon design heights set out in the Works Plan, and up to 18 metres for certain pylons where it is necessary to allow a change from proposed low height pylons to standard height pylons.	The assessment presented within Section 11.7 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], 6.11.A2 Environmental Statement Appendix 11.2 Historic Environment Assessment Tables [AS-070] and 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] has been undertaken based on the design shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] and 6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134]. 'Sensitivity testing' has been undertaken to determine if changes to the design, within the LoD, would affect the assessment, as set out in Section 11.9 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. This section includes consideration of design scenarios including changes to low height pylons south of the River Chelmer. Alternative locations could change the assessment for the historic environment in relation to physical impacts and impacts through change to setting that affect the value of a heritage asset. While alternative locations within the LoD have been considered, the Environmental Statement assessment comprehensively accounts for the reasonable worst-

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			case physical and setting impacts on heritage assets. Therefore, no significant effects beyond those reported in the ES residual effects section are anticipated due to alternative pylon locations or adjustments within the LoD. The Study Areas for Historic Environment are set from the Order Limits and therefore the baseline accounts for the LoD. The LoD was reviewed and in particularly sensitive locations for heritage assets specific commitments are set out in 7.2 Outline Code of Construction Practice [Revision B] to restrict the longitudinal LoD. The assessment in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], 6.11.A2 Environmental Statement Appendix 11.2 Historic Environment Assessment Tables [AS-070] and 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] has considered the reasonable worst-case potential effects of locating pylons or conductors anywhere within the LoD and has considered the potential effects of a vertical increase in height of up to 6 m from the pylon design heights presented within 2.3 Works Plans [APP-017 – APP-024].
6.4.31 - 34	Thurrock Council	The LoD are of particular potential concern with regards to the following designated heritage assets which are in closest proximity to the Order Limits and where a Mid-level of LTSH to their significance has been identified by the Applicant at the operation and maintenance phase of the Project. NB: These are provided as examples and are not intended to be an exhaustive list of all assets where there are potential concerns with regards to the LoD. There is the	See response to paragraphs 6.4.28-29 above. The Applicant welcomes the Council's support for the measures within commitment GG34 within 7.2 Outline Code of Construction Practice [Revision B] relating to restrictions on the longitudinal LoD for pylon TB245 to reduce historic environment effects on Wyfields Farmhouse. The measures within commitment GG34 were identified following Project-wide review of the

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		potential for designated heritage assets that have been assessed as having a Low level of LTSH to their significance to experience a Mid-level of LTSH due to pylons, overhead lines and other permanent above ground structures being located in closer proximity within the lateral and longitudinal limits of deviation. Thurrock (Section H): • Grade II listed Wyfields Farmhouse (List entry number 1337057). • Grade II listed Barn to North of Wyfields Farmhouse (List entry number 1111646). Commitment GG34 in Table 6.1 of 'Document 7.2 Outline Code of Construction Practice' ("OCOCP"), sets out commitments to restricting the movement of specific pylons or infrastructure along the longitudinal limits of deviation. There is a commitment to 'seek to move pylon TB245 north to reduce heritage effects of the pylon' on Grade II listed Wyfields Farmhouse (List entry number 1337057) in Thurrock (Section H), which the Council would support. Where such assets have been identified, the lateral and vertical LoD would still apply. These commitments are to be confirmed by the Main Works Contractor(s) if the Project is consented. It is unclear whether these proposed restrictions to the LoD with regard to the setting and significance of designated heritage assets arose as part of a systematic approach to identification as part of the ES assessment and this should be clarified in order to establish whether similar restrictions to the LoD	historic environment assessment to provide a consistent approach. Lateral and vertical LoD limits remain applicable in order to accommodate engineering, environmental and construction requirements.

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		were considered for other assets but rejected due to other requirements/constraints or restrictions.	
6.4.46 - 47	Thurrock Council	Standard mitigation measures relate to the construction phase of the Project. Of these, the following are relevant: H06: Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). Where such features cannot be retained, replacement will be installed as appropriate (including reinstating hedgerows, fences, walls and earthworks). The Council recommends that this is further expanded to clarify the definitions of ‘appropriate’ replacements, and ask for the relevant local authorities to be contacted before such elements are removed, in order to discuss the manner of replacement as well as the extent of any removals of fences, walls, etc.	The term ‘appropriate’ in this context refers to the reinstatement of landscape features (such as hedgerows, fences, walls, and earthworks) in a manner that is sensitive to the local character, setting, and historic significance of the area. The general approach and reinstatement plans can be found in Section 9 of 7.4 Outline Landscape and Ecological Management Plan [Revision C]. Specifically, this means: • Replacement features will be of a similar type, scale, and material to those lost, wherever possible, reflecting the character and function of the original feature • Design and siting will be informed by local landscape character assessments, historic environment records, and where relevant, consultation with Local Planning Authorities and heritage specialists • Species selection for replanting (e.g., hedgerows) will seek to match historic or locally appropriate species mixes, and construction/restoration of walls or banks will use traditional techniques and materials where feasible • If retention of a feature is not possible, the replacement or reinstatement will be designed to ensure that the heritage, ecological and landscape value is maintained or, where possible, enhanced.

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6.4.48	Thurrock Council	The Council recommend expansion of H07, to create a hotline or method of contact for building owners who are concerned about the effects of construction vibration on their buildings as works are undertaken, to allay fears and allow the monitoring of effects.	6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] did not identify any heritage assets in Thurrock that would be impacted by the Project.
6.4.49	Thurrock Council	Following the Council's review and assessment of the Applicant's conclusions on the impacts of the Project on heritage assets, for each designated heritage asset where a Mid-Level of LTSH has been identified to its significance at the construction phase of the Project, the Council would request further details are provided by the Applicant regarding the mitigation measures that have been employed, for example, the selected locations of haul roads and other aspects of construction related activity and infrastructure and whether or what, if any, alternatives were assessed prior to the submitted project design.	Where a mid-level less than substantial harm conclusion has been reached for the construction phase impacts in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] , these impacts would be temporary and the construction related elements of the Project would be reinstated following completion of construction. Therefore, it is not considered necessary to microsite all temporary elements of the works. However, 5.15 Design Development Report [APP-122] provides an explanation of the main changes in the route alignment, infrastructure siting and technology incorporated into the Project following review and consideration of the feedback received to the 2024 statutory consultation and to the targeted statutory and non-statutory consultations held in 2025. Changes to temporary construction works were considered as part of this. 5.15 Design Development Report [APP-122] addresses the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering

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			feasibility and risks, cost and programme amongst other factors.
Appendix A; 7.0	Thurrock Council	Article 5 - Limits of deviation The current drafting of Article 5(1) permits the undertaker to deviate from controls and restrictions that would otherwise apply, for example in circumstances such as those set out in Article 5(1)(b) with regard to pylon works. The carrying out of works within the limits of deviation does not require the undertaker to seek prior approval from the relevant planning authority. As such, the Council is concerned that the Outline CoCP [APP-300] does not contain any specific commitments that apply to works in sensitive areas such as listed building or conservation areas. The Council requests that the Applicant clarifies its approach to the carrying out of works in sensitive areas such as listed building or conservation areas and includes a commitment within the Outline CoCP and/or by another mechanism secured within the draft DCO that would safeguard these areas.	There are no proposed works in listed buildings and very limited interaction of the Order Limits with Conservation Areas. There are no listed buildings or conservation areas within the Order Limits within Thurrock. Regarding the approach to assessment of the LoD, please see response to paragraphs 6.4.28 – 29 and 6.4.31 – 34 above.
8.1.3	South Norfolk District Council	Construction Phase Impacts: Construction activity, including temporary access routes, vegetation removal and compound installation, will introduce noise, movement and visual disruption. This is likely to erode the rural setting of heritage assets close to the Order Limits.	The Applicant acknowledges that construction activities, including temporary access routes, vegetation removal, and compound installation, may cause temporary noise, movement, and visual disruption. The Project has been carefully designed with sensitive routeing and siting to avoid and minimise impacts on heritage assets and their rural setting. During the construction phase the impact of the Project on the setting of designated and non-designated heritage assets was assessed in accordance with 6.19 Scoping Report [APP-288 - APP-296] and 6.20

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			Scoping Opinion [APP-297], the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and in accordance with professional heritage sector guidance⁶². The assessment has not concluded any substantial harm to heritage assets during construction, although less than substantial harm has been identified as is common for many types of developments and should be considered in the context of the planning balance of the benefits of the Project.
8.1.4	South Norfolk District Council	Operational Impacts: The introduction of tall pylons and overhead conductors across an open landscape will permanently alter the visual context of several heritage assets. The ES identifies moderate adverse impacts on multiple designated assets which is significant in planning terms. No major adverse effects are reported, although the Council considers that harm may be greater than identified in some cases.	6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Projects likely significant effects on designated and non-designated heritage assets. The Project will not result in any substantial harm to designated heritage assets. Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the SoS, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the NPSs. Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] demonstrates that the Project

⁶² Historic England (2017) The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)

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			results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provides that the Secretary of State will take as a starting point that CNP infrastructure meet any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.
8.1.5	South Norfolk District Council	Cumulative Impacts: Cumulative impacts arise from the interaction between the proposed pylons and other major energy and grid-related developments, including solar farms, BESS schemes and substations. Combined, these effects intensify the industrialisation of the rural landscape and alter heritage settings more significantly than each project in isolation	A cumulative assessment was undertaken, as set out in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. In South Norfolk a moderate adverse and significant inter-project cumulative effect is assessed due to increase in energy infrastructure within the setting of the assets for Kenningham Hall grade II listed building (1373056) and Venta Icenorum: Roman town and associated prehistoric, Anglo-Saxon and medieval remains (1021463), as set out in paragraphs 17.5.49 to 17.5.52 of 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281].

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			Embedded, standard and additional mitigation is already proposed for the historic environment, as set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and proposals in 7.2 Outline Code of Construction Practice [Revision B] , 7.4 Outline Landscape and Ecological Management Plan [Revision C] and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] .
10.3.1 - 2	South Norfolk District Council	The project will result in less-than-substantial harm to multiple designated heritage assets, including listed buildings, conservation areas and scheduled monuments. Several impacts are assessed as moderate adverse, which is significant in planning terms. The Examining Authority's attention is drawn to: • The erosion of rural settings and long-distance views that contribute strongly to asset significance; • Underestimation of harm in some locations identified by the Council; • Cumulative impacts from multiple grid-related schemes altering the wider historic landscape	Please refer to the above responses provided for paragraphs 8.1.3 to 8.1.5 and to the Applicant's response to the Council's Relevant Representation.
15.6, bullet point 1	Tendring District Council	The pylon arc that swings around Ardleigh would industrialise the rural setting of the conservation-area core and multiple listed buildings, introducing prominent, moving skyline elements and wire-scape that would be perceived across open farmland and valley edges. The ES recognises numerous Tendring assets within the 2–3 km study area and assesses	Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the LVIA study area, as illustrated on 6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240] . There are also a high number of nationally designated landscapes, valued for

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		several as experiencing adverse setting effects; however, its conclusion that most effects are not significant does not reflect the concentration, coherence and visibility of the arc around Ardleigh.	their natural beauty, which have historically been designated despite the presence of transmission infrastructure. The rural landscape will remain in place beneath and around the proposed overhead line. The Applicant acknowledges that the settings of some designated assets fall partially within the Order Limits and this is assessed within 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The Project has also assessed the level of harm in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] on designated assets where land that forms part of the setting of designated assets falls within the Order Limits. The assessment has not concluded any substantial harm to heritage assets, although less than substantial harm has been identified as is common for many types of developments and should be considered in the context of the planning balance of the benefits of the Project. As the Project is classified as critical national priority as set out in section 4.2 of NPS EN-1 (2024) the Secretary of State will take as a starting point that CNP infrastructure will meet the test for public benefit that outweighs harm, even if substantial harm were identified, as set out in paragraph 4.2.15-17 of NPS EN-1 (2024). Descriptions of setting are detailed in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209].

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15.6, bullet point 2	Tendring District Council	For certain assets (e.g., Bounds Farmhouse) the ES itself records significant residual effects, and for others (e.g., Church of St Mary; Lowe Hill House; several Grade II farmsteads) it records medium/temporary adverse effects during construction—an under-estimation in TDC’s view given the permanent alteration of setting from 40–50 m pylons and continuous conductors.	The Applicant acknowledges that the settings of some designated assets fall partially within the Order Limits and this is assessed within 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. However, the Applicant disagrees with the Council's conclusion of assessment and considers the Project's assessment is appropriate for the reasons set out in the assessment. The Project's assessment for the construction phase identifies adverse impacts during construction that result from changes in the setting of heritage assets. As these impacts are the result of construction activities they are considered to be of a temporary nature. The assessment of the operation (and maintenance) phase focuses on the impact the pylons and other aboveground permanent infrastructure (substations, Cable Sealing End compounds etc.) have on the settings of heritage assets. Impacts caused by the above ground infrastructure is considered to be permanent. The Applicant is confident that the assessment of the historic environment regarding the Project's impact within Tendring District and discussed and presented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209], 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215], and 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] is appropriate.

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15.6, bullet point 3	Tendring District Council	LoD risk: Article 5 (of the DCO) currently allow lateral moves up to 50 m and height increases up to +6 m (or +18 m where switching pylon type)—making already harmful relationships materially worse by bringing structures closer to façades, churchyards and landmark views that are key to significance. ECC Place Services expressly warn Tendring assets could step up a harm band because of LoD.	The assessment presented within Section 11.7 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] and 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] has been undertaken on the design shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] and 6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134]. ‘Sensitivity testing’ has been undertaken to determine if changes to the design within the LoD would affect the assessment, as set out in Section 11.9 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Alternative locations could change the assessment for the historic environment in relation to physical impacts and impacts through change to setting that affect the value of a heritage asset. While alternative locations within the LoD have been considered, the Environmental Statement assessment comprehensively accounts for the reasonable worst-case physical and setting impacts on heritage assets. Therefore, no significant effects beyond those reported in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] residual effects section (section 11.7) are anticipated due to alternative pylon locations or adjustments within the LoD. The Study Areas for Historic Environment are set from the Order Limits and therefore the baseline accounts for the LoD. The LoD was reviewed and in particularly sensitive locations for

ID	Stakeholder	Comment	NG Response
			heritage assets specific commitments are set out in 7.2 Outline Code of Construction Practice [Revision B] to restrict the longitudinal LoD. The assessment in this chapter and its appendices has considered the reasonable worst-case potential effects of locating pylons or conductors anywhere within the LoD and has considered the potential effects of a vertical increase in height of up to 6 m from the pylon design heights presented within 2.3 Works Plans [APP-017 – APP-024] .
15.7	Tendring District Council	Non-designated heritage assets (NDHAs) are under-assessed The Applicant's approach does not assess setting for low-value NDHAs and has not expressed impacts on built NDHAs in "harm to significance" terms, contrary to the balanced-judgement requirement in EN-1 5.9.33. This systematically under-captures effects on historic farmsteads, lanes and locally listed buildings that together comprise the living historic landscape of Ardleigh and its parishes.	The Applicant disagrees, all non-designated heritage assets were assessed to determine their value in accordance with 6.19 Scoping Report [APP-288 – APP-296], 6.20 Scoping Opinion [APP-297] and the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Those assets assessed to have a low or negligible value and located outside the Order Limits did not have a settings assessment undertaken. As they would not experience physical impacts there is no potential for significant effects as a result of change to setting for assets of these values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. Instructions in NPS EN-1 (2024) regarding the Applicant's assessment include paragraph 5.9.9 '<i>The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES</i>'; and in several places there is reference to detail being proportionate to the importance/significance of the heritage asset. The

ID	Stakeholder	Comment	NG Response
			Project therefore considers that it has appropriately complied with relevant policy in NPS EN-1 (2024) regarding assessment of impacts to non-designated heritage assets.
15.9, bullet point 1	Tendring District Council	The Ardleigh area is singled out by the project itself for priority archaeological evaluation; geophysics/trenching correlate with cropmark complexes and Roman/ medieval activity, underlining the high archaeological sensitivity of the corridor chosen around Ardleigh. Yet post-submission work was still incomplete at ES stage, leaving risk of avoidable loss or sub-optimal design.	A programme of archaeological evaluation has been discussed and agreed with Local Planning Authority Archaeological Advisors and Historic England, as set out in the relevant Statements of Common Ground (5.9 Draft Statement of Common Ground [APP-089 to APP-100 and APP-102]). All completed interim and assessment reports for geophysical survey and trial trenching were submitted with the application for development consent in 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey Results Report [APP-212] and 6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213] along with the reports of geoarchaeological and archaeological monitoring of ground investigation works (6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]). The archaeological evaluation work (geophysics and trial trenching) has continued since the submission of the application for development consent, continuing the Applicant's commitment to the historic environment potentially affected by the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] to 6.11.F6 Environmental Statement Figure 11.6 - Phase 2

ID	Stakeholder	Comment	NG Response
			Geophysical Survey Preliminary Results [AS-083], of which the historic environment stakeholders are aware. At this stage approximately 3,000 trial trenches and 1,650 ha of geophysical survey have been completed. This information included further priority geophysical survey and trial trenching results, and preliminary results of part of the Phase 2 geophysical survey. The Phase 2 stage of the geophysical survey and trial trenching will continue throughout 2026, and all the results of this work will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed at monthly meetings and set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. The vast majority of the priority geophysical survey and trial trenching are complete and included in the Supplementary Environmental Information. The fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State.
15.9, bullet point 2	Tendring District Council	Cumulative effects with other NSIPs (e.g., North Falls and Five Estuaries) and with the EACN substation magnify landscape and setting change, a point repeatedly raised by TDC and ECC Place Services and not resolved by the Applicant's cumulative assessment.	No significant cumulative effects were identified for any designated or non-designated heritage assets located within Tendring as set out in paragraphs 17.5.49 to 17.5.52 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] . The Applicant considers the conclusions of the cumulative assessment for the historic environment to be appropriate.

ID	Stakeholder	Comment	NG Response
15.10	Tendring District Council	Methodological exclusions (NDHAs' setting; "harm to significance" language for built NDHAs) and heavy reliance on embedded/ standard mitigation lead to systematic downgrading of effect significance in Tendring.	See response to paragraph 15.7. In accordance with the NPS (EN-1) (2024), mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording. In addition to embedded and standard mitigation measures screening planting was considered for the historic environment and the conclusion reached that further planting would alter the existing setting of designated heritage assets, likely introducing harmful change, as set out in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The assessment considered that the implementation of standard construction mitigation would benefit the historic environment but would not reduce the change in setting enough to reduce the impact, and therefore the application of standard construction mitigation has not downgraded significance of effect conclusions. The levels of harm identified are lower - mid less than substantial harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) and a range of embedded, standard and additional mitigation measures are already proposed. Given the levels of harm and the mitigation measures proposed no further mitigation was considered appropriate.
15.11	Tendring District Council	LoD flexibility is not transparently sensitivity-tested for the worst-case alignment in the Ardleigh cluster,	See response to paragraph 15.6.

ID	Stakeholder	Comment	NG Response
		despite Place Services' explicit warning that LoD could convert low to mid-level less-than -substantial harm.	
15.12	Tendring District Council	Concentration and coherence of adverse change around Ardleigh are not sufficiently weighed; the Applicant largely evaluates asset-by-asset, missing the combined townscape/landscape effect on the conservation-area settlement and its setting	The assessment of Ardleigh conservation area and associated heritage assets was informed by the conservation area appraisal and by site walkover and setting survey, as described in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] . The assessment presented in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] takes these into account to provide an appropriate assessment in accordance with 6.19 Scoping Report [APP-288 – APP-296] , 6.20 Scoping Opinion [APP-297] and the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] .
15.13	Tendring District Council	Ardleigh (Conservation Area and setting): Significant adverse (operational) due to permanent, conspicuous pylons and wire-scape around the settlement and across contributing fields/valleys. Construction: significant due to compounds/haul routes/ vegetation loss and noise.	The Applicant acknowledges that the settings of some designated assets fall partially within the Order Limits and this is assessed within 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] . However, the Applicant disagrees with the Council's conclusion of assessment and considers the Project's assessment is appropriate for the reasons set out therein, which concluded temporary minor adverse significance of effect on the asset (not significant) during construction and permanent minor adverse significance of effect (not significant) during operation (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]), and Lower Less Than Substantial Harm for both phases (6.11.A7 Environmental Statement

ID	Stakeholder	Comment	NG Response
			Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]). Descriptions of setting are detailed in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP209].
15.14	Tendring District Council	Listed buildings in the Ardleigh hinterland (e.g., Bounds Farmhouse, St Mary's, Lowe Hill House, and several Grade II farmsteads and houses): Significant less-than- substantial harm to setting when the LoD "worst-case" is considered; at minimum moderate adverse residual effects.	The assessment presented within Section 11.7 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] and 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] has been undertaken on the design shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] and 6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134]. 'Sensitivity testing' has been undertaken to determine if changes to the design within the LoD would affect the assessment, as set out in Section 11.9 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Alternative locations could change the assessment for the historic environment in relation to physical impacts and impacts through change to setting that affect the value of a heritage asset. Pylon positions would have implications for the settings of heritage assets. The Study Areas for Historic Environment are set from the Order Limits and therefore the baseline accounts for the LoD. The LoD was reviewed and in particularly sensitive locations for heritage assets specific commitments are set out in 7.2 Outline Code of Construction Practice [Revision B]

ID	Stakeholder	Comment	NG Response
			to restrict the longitudinal LoD. The assessment in this chapter and its appendices has considered the reasonable worst-case potential effects of locating pylons or conductors anywhere within the LoD and has considered the potential effects of a vertical increase in height of up to 6 m from the pylon design heights presented within 2.3 Works Plans [APP-017 – APP-024] . The Applicant still considers the conclusions of assessment for these assets to be appropriate for the reasons given in their assessment.
15.15	Tendring District Council	Scheduled cropmark(s) and NDHAs around Ardleigh: Significant construction impacts (loss, fragmentation, or erosion of contextual setting); the risk remains elevated until intrusive evaluation and design fixes are secured by enforceable requirements.	The Applicant fully recognises the importance of safeguarding archaeological remains of national significance, and our approach is aligned with this principle. The approach set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and secured through Requirement 5 within 3.1 Draft Development Consent Order [APP-056] already includes provision for a range of mitigation strategies, including preservation in situ, should highly significant remains be identified. The archaeological evaluation work (geophysics and trial trenching) has continued since the submission of the application for development consent, continuing the Applicant's commitment to the historic environment potentially affected by the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] to 6.11.F6 Environmental Statement Figure 11.6 - Phase 2 Geophysical Survey Preliminary Results [AS-083],

ID	Stakeholder	Comment	NG Response
			of which the historic environment stakeholders are aware. At this stage approximately 3,000 trial trenches and 1,650 ha of geophysical survey have been completed. This information included further priority geophysical survey and trial trenching results, and preliminary results of part of the Phase 2 geophysical survey. The Phase 2 stage of the geophysical survey and trial trenching will continue throughout 2026, and all the results of this work will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed at monthly meetings and set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. The vast majority of the priority geophysical survey and trial trenching are complete and included in the Supplementary Environmental Information. The fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State.
15.17	Tendring District Council	Design and siting required by TDC (avoidance first) Re-route/underground the Ardleigh arc segment most harmful to the Conservation Area and clustered listed buildings—or, as a minimum, fix the Order Limits and remove LoD flexibility within 1 km of the Ardleigh CA boundary and the listed assets listed above. (No lateral/ vertical deviation beyond the fixed design envelope; no upward pylon height tolerance.	Response regarding LoD as for paragraph 15.6. The Project would lead to no harm or less than substantial harm to listed buildings and conservation areas. Embedded and standard mitigation proposals for listed buildings and conservation areas are set out in 7.2 Outline Code of Construction Practice [Revision B] and 7.4 Outline Landscape and Ecological Management Plan [Revision C]. The Project’s mitigation strategy has been developed in consultation with heritage stakeholders, including the

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		Heritage-led micrositeing protocol for every new pylon/gantry within Tendring: require photomontages from CA gateways and principal listed assets and stakeholder sign-off (TDC/Place Services/Historic England) before discharge of design approval.	Council and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording. Regarding embedded mitigation, 5.15 Design Development Report [APP-122] provides an explanation of the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors. The area around Ardleigh is discussed in section 6.5 of 5.15 Design Development Report [APP-122]. Given the assessment concludes at worst less than substantial harm, and the mitigation hierarchy has been followed, NPS EN-1 (2024) does not require the Applicant to take any further measures. Viewpoint photography and photomontages have already been provided for key views from the conservation area appraisal with potential to be affected by the Project, as shown on 6.11.F5 Environmental Statement Figure 11.5 - Historic Environment and LVIA Viewpoint Locations [APP-220] and 7.12 Visualisations [APP-343 to APP-351].

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15.18	Tendring District Council	Construction controls targeted at sensitive assets required by TDC Protected lanes and historic hedgerows: secure measured survey, method statements and like-for-like reinstatement (species, profiles, banks, ditches) with a 10-year establishment/ aftercare and replacement guarantees (not the default five years).	The five-year monitoring period for tree and hedgerow replacement planting is considered sufficient to ensure successful establishment and is in line with other recent Nationally Significant Infrastructure Projects. The monitoring period is adaptive, as stated within 7.4 Outline Landscape and Ecological Management Plan [Revision C] which includes like-for-like replacement or consideration of alternative species based on site conditions and the reasons for failure. Requirement 9(7) (reinstatement planting plan) in Schedule 3 of 3.1 Draft Development Consent Order [APP-056] secures the replacement of any trees or hedgerows planted as part of an approved reinstatement planting plan that, within a period of five years after planting, are removed, die or become seriously damaged or diseased. The 7.4 Outline Landscape and Ecological Management Plan [Revision C] also includes measures to retain and reinstate historic landscape features including protected lanes, in addition to the commitment set out in H06 of 7.2 Outline Code of Construction Practice [Revision B]. Commitment H06 in 7.2 Outline Code of Construction Practice [Revision B] to be issued at Deadline 2 is proposed to be updated to: <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). To support this approach, a topographic survey will be undertaken in advance of works/impacts to each Protected Lane (Essex) and Historic Lane (Suffolk) within the Order Limits, where likely to be affected by physical works. The survey will include mapping of any</i>

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			<i>historic earthwork features associated with the Protected / Historic Lane, including associated banks and ditches. During construction, the contractor will seek to limit the working area at the narrower sections of impacted lanes, to that which is practicable for the works to be delivered. Any historic features associated with the lane will be reinstated at the end of construction activities to the pre-work condition, including the reinstatement of hedgerow margins and historic earthworks. Where such features cannot be retained, compensatory design elements will be provided as appropriate (including hedgerows, fences, walls and earthworks).'</i>
15.19	Tendring District Council	Archaeology and NDHAs Strengthen Requirement 5 (Archaeology) to require completion of priority trenching in the Ardleigh/Little Bromley corridor pre-construction, publication of results, and where high-value remains or setting receptors are identified as early as possible.	The Applicant fully recognises the importance of safeguarding archaeological remains of national significance, and our approach is aligned with this principle. The approach set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and secured through Requirement 5 within 3.1 Draft Development Consent Order [APP-056] already includes provision for further evaluation and a range of mitigation strategies, including preservation in situ, should highly significant remains be identified.
15.20	Tendring District Council	Compensation for residual harm - Where avoidance/mitigation cannot prevent significant setting harm, secure a Tendring Heritage Compensation Package, comprising: - Targeted undergrounding of short spans at the worst-affected Ardleigh views (if re-route is not secured); and/or	Embedded, standard and additional mitigation is already proposed for the historic environment, as set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and proposals in 7.2 Outline Code of Construction Practice [Revision B], 7.4 Outline Landscape and Ecological Management Plan [Revision C] and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of

ID	Stakeholder	Comment	NG Response
		A ring-fenced Historic Environment Fund for conservation projects in Tendring District (e.g., fabric repairs, setting enhancements, public realm in Ardleigh CA), heritage interpretation, and condition surveys, prioritised by TDC.	Investigation [APP-328]. Neither National Policy Statement EN-1 (2024) nor the National Planning Policy Framework (2025)⁶³ make reference to a requirement for compensation for any harm to heritage assets.
15.21	Tendring District Council	Monitoring, enforcement and transparency TDC requests a Tendring-specific Design & Heritage Compliance Plan requiring: construction photographic logs at fixed locations, a public dashboard of LoD usage (showing any in-Tendring movement/height changes), and no-deviation zones around or close to a certain distance (tbc in a DCO discharge requirement) listed buildings/CA	The Applicant does not consider a design and compliance plan is required as all mitigation is already secured through 7.2 Outline Code of Construction Practice [Revision B], 7.4 Outline Landscape and Ecological Management Plan [Revision C] and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and the relevant requirements within 3.1 Draft Development Consent Order [APP-056]. A public dashboard of LoD usage is not required due to the conclusions in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] as set out in response to paragraph 15.6. No deviation zones are not considered necessary due to measures secured through secured through 7.2 Outline Code of Construction Practice [Revision B], 7.4 Outline Landscape and Ecological Management Plan [Revision C] and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and the relevant requirements within 3.1 Draft Development Consent Order [APP-056]. The Project's approach is typical of other National Significant Infrastructure Projects.

⁶³ Ministry of Housing, Communities and Local Government (2025) National Planning Policy Framework

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10.81	Colchester City Council	Outline Code of Construction Practice (CoCP) Standard and additional mitigation measures for archaeology are also set out in the Outline CoCP (APP-300). Mitigation requirements are included within Section 6 (6.1.13) of the outline CoCP with reference to the Outline AMS and WSI (APP-328) and mitigation measures listed in Table 6.1. Register of Environmental Commitments. Historic Environment (archaeology) is covered under H01 to H05 and are agreed as appropriate. H04 should add: <i>‘The Principal Contractor(s) will be responsible for making sure staff are aware of what to do in the event of an unexpected heritage asset. This should include toolbox talks within site inductions’.</i> Mitigation for Protected Lanes is included under H06. In order to protect the historic features of the protected lane a permanent record should be completed prior to any changes which would allow more accurate re-instatement. The requirement for this should be included under H06 and the mode and mechanism for this process included in the final Landscape and Ecological Management Plan (LEMP). It is noted that the measures proposed by the National Grid Bramford to Twinstead project (H05) included a more robust mechanism for their protection. It is recommended that this measure is adopted. See below: <i>‘A topographic survey will be undertaken in advance of construction of each Protected Lane (Essex) and Historic Lane (Suffolk) within the Order Limits where likely to be affected by physical works. The survey</i>	Commitment H04 in 7.2 Outline Code of Construction Practice [Revision B] to be issued at Deadline 2 is proposed to be updated to include this additional wording: <i>‘The Principal Contractor(s) will be responsible for making sure staff are aware of what to do in the event of an unexpected heritage asset. This should include toolbox talks within site inductions.’</i> The 7.4 Outline Landscape and Ecological Management Plan [Revision C] includes measures to retain and reinstate historic landscape features including protected lanes, in addition to the commitment set out in H06 of 7.2 Outline Code of Construction Practice [Revision B]. Commitment H06 in 7.2 Outline Code of Construction Practice [Revision B] to be issued at Deadline 2 is proposed to be updated to: <i>‘Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). To support this approach, a topographic survey will be undertaken in advance of works/impacts to each Protected Lane (Essex) and Historic Lane (Suffolk) within the Order Limits, where likely to be affected by physical works. The survey will include mapping of any historic earthwork features associated with the Protected / Historic Lane, including associated banks and ditches. During construction, the contractor will seek to limit the working area at the narrower sections of impacted lanes, to that which is practicable for the works to be delivered. Any historic features associated with the lane will be reinstated at the end of</i>

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		<i>will include mapping of any historic earthwork features associated with the lane, including banks and ditches. During construction, the contractor will seek to limit the working area to the narrowest section of lane that is practicable for the works. Any historic features associated with the lane will be reinstated at the end of construction to the pre-work condition, including the replanting of hedgerows and reinstatement of historic earthworks’.</i>	<i>construction activities to the pre-work condition, including the reinstatement of hedgerow margins and historic earthworks. Where such features cannot be retained, compensatory design elements will be provided as appropriate (including hedgerows, fences, walls and earthworks).’</i>
10.86	Colchester City Council	Outline Landscape and Ecological Management Plan (LEMP) 10.86 The Outline Landscape and Ecological Management Plan (LEMP) (APP-321) includes measures to protect and reinstate historic landscape features including protected lanes, in addition to the commitment set out in H06 of the Outline CoCP (APP-300). The plan does not include sufficient controls to ensure the accurate re-instatement of historic features should removal or changes be required during construction. The following should be added to Section 7.9: <i>7.9.2 - Should removal of features, other than hedgerows, associated with the protected lane be required, such as banks, verges, earthworks, a suitable method of recording of all historic features associated with the protected lane should be carried out in order to facilitate accurate re-instatement.</i>	Section 9.8 of 7.4 Outline Landscape and Ecological Management [Revision C] already includes provision for reinstatement of protected lanes, include vegetation, earthworks and other boundary features and for pre-construction photographs to be taken to ensure a record is available to inform any reinstatement. Commitment H06 in 7.2 Outline Code of Construction Practice [Revision B] to be issued at Deadline 2 is proposed to be updated to: <i>‘Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). To support this approach, a topographic survey will be undertaken in advance of works/impacts to each Protected Lane (Essex) and Historic Lane (Suffolk) within the Order Limits, where likely to be affected by physical works. The survey will include mapping of any historic earthwork features associated with the Protected / Historic Lane, including associated banks and ditches. During construction, the contractor will seek to limit the working area at the narrower sections of impacted lanes, to that which is practicable for the</i>

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			<i>works to be delivered. Any historic features associated with the lane will be reinstated at the end of construction activities to the pre-work condition, including the reinstatement of hedgerow margins and historic earthworks. Where such features cannot be retained, compensatory design elements will be provided as appropriate (including hedgerows, fences, walls and earthworks).'</i>
10.104	Colchester City Council	The limits of deviation are of particular potential concern with regards to the following designated heritage assets which are in closest proximity to the Order Limits and where a Mid-level of Less than Substantial Harm (LTSH) to their significance has been identified by the Applicant at the Operation and Maintenance phase of the project. NB These are provided as examples and are not intended to be an exhaustive list of all assets where there are potential concerns with regards to the limits of deviation. There is the potential for designated heritage assets that have been assessed as having a Low level of LTSH to their significance during the operational phase to instead experience a Mid-level of LTSH due to pylons, overhead lines and other permanent above ground structures being in closer proximity than the existing plans, due to the proposed lateral and longitudinal limits of deviation.	The assessment presented within Section 11.7 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] , 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] and 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] has been undertaken on the design shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] and 6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134] . 'Sensitivity testing' has been undertaken to determine if changes to the design within the LoD would affect the assessment, as set out in Section 11.9 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] . Alternative locations could change the assessment for the historic environment in relation to physical impacts and impacts through change to setting that affect the value of a heritage asset. While alternative locations within the LoD have been considered, the Environmental Statement assessment comprehensively accounts for the reasonable worst-case physical and setting impacts on heritage assets. Therefore, no significant effects

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			beyond those reported in the ES residual effects section are anticipated due to alternative pylon locations or adjustments within the LoD. The Study Areas for Historic Environment are set from the Order Limits and therefore the baseline accounts for the LoD. The LoD was reviewed and in particularly sensitive locations for heritage assets specific commitments are set out in 7.2 Outline Code of Construction Practice [Revision B] to restrict the longitudinal LoD. The assessment in this chapter and its appendices has considered the reasonable worst-case potential effects of locating pylons or conductors anywhere within the LoD and has considered the potential effects of a vertical increase in height of up to 6 m from the pylon design heights presented within 2.3 Works Plans [APP-017 – APP-024] .
10.106	Colchester City Council	Following our review and assessment of NG's conclusions on the impacts of the project on heritage assets, for each designated heritage asset where a Mid-Level of less than substantial harm has been identified to its significance at the Operation and Maintenance phase of the project we would request further details are provided by National Grid regarding the embedded mitigation measures that have been employed, for example, the selected overhead line routes and pylon location.	Embedded mitigation measures applied to those assets where a mid level of less than substantial harm has been concluded in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] includes sensitive routeing and siting. Specific alterations that have been made to remove or reduce effects on heritage assets through restriction of the Limits of Deviation are secured through commitment GG34 of 7.2 Outline Code of Construction Practice [Revision B] . 5.15 Design Development Report [APP-122] provides an explanation of the main changes in the route alignment, infrastructure siting and technology incorporated into the Project following review and consideration of the feedback received to the 2024

ID	Stakeholder	Comment	NG Response
			statutory consultation and to the targeted statutory and non-statutory consultations held in 2025. 5.15 Design Development Report [APP-122] addresses the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors.
10.3.2	Braintree District Council	In terms of designated heritage assets, there are none directly within the Order Limits; however, the project boundaries encompass the setting of many designated heritage assets including listed buildings and three conservation areas (Coggeshall, Silver End and White Notley). The impacts upon specific designated heritage assets are discussed in the Local Impact of Development section below.	The Applicant disagrees that the settings of the three Conservation Areas extend to the Order Limits. The impact of the Project on the setting of designated heritage assets 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 guidance⁶⁴. The assessment of the setting of these three heritage assets in Braintree District have been reviewed and the Applicant is confident in its assessment, as set out in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209].
10.5.5, 10.5.7-8	Braintree District Council	The Council is concerned that the LoD, if used, would worsen the temporary construction and permanent impacts on the setting and significance of heritage assets to those set out in the Applicant's Environmental Statement assessments...	The assessment presented within Section 11.7 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] and 6.11.A7

⁶⁴ Historic England (2017) The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)

ID	Stakeholder	Comment	NG Response
		The LoD are of particular concern to the Council with regards to the following designated heritage assets [list not included here] closest to the Order Limits and where a mid-level of LTSH to their significance has been identified by the Applicant at the Operation and Maintenance phase of the project. ...the Council requests that the Applicant provide greater certainty regarding pylon positions, particularly for the following listed buildings, to assure that the LoD will not result in greater harm than identified: Feeringbury Manor group (1306710, including Barn 1123829); Monks Farm Cottages (1171147); Pound Farmhouse (1123812); Hungry Hall Farmhouse (1123868); Westocks Farmhouse group (1168106); and Rivenhall Place (1122598).	Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] has been undertaken on the design shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] and 6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134]. ‘Sensitivity testing’ has been undertaken to determine if changes to the design within the LoD would affect the assessment, as set out in Section 11.9 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Alternative locations could change the assessment for the historic environment in relation to physical impacts and impacts through change to setting that affect the value of a heritage asset. While alternative locations within the LoD have been considered, the Environmental Statement assessment comprehensively accounts for the reasonable worst-case physical and setting impacts on heritage assets. Therefore, no significant effects beyond those reported in the ES residual effects section are anticipated due to alternative pylon locations or adjustments within the LoD. The Study Areas for Historic Environment are set from the Order Limits and therefore the baseline accounts for the LoD. The LoD was reviewed and in particularly sensitive locations for heritage assets specific commitments are set out in 7.2 Outline Code of Construction Practice [Revision B] to restrict the longitudinal LoD. The assessment in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and its appendices has considered the reasonable worst-case potential effects of locating pylons or conductors

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			anywhere within the LoD and has considered the potential effects of a vertical increase in height of up to 6 m from the pylon design heights presented within 2.3 Works Plans [APP-017 – APP-024] .
10.5.22	Braintree District Council	...changes to the local water and burial environment could alter the preservation of archaeological sites within and beyond the development areas.	Geoarchaeological monitoring of Ground Investigation works at three locations with high potential for geoarchaeological remains and potential impact from the Project took place prior to submission and the results of this work, including deposit models, are included in 6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]. Provision for further geoarchaeological work is included in the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], which will be updated in consultation with Local Planning Authority Archaeological Advisors to consider any detailed comments provided in Local Impact Reports. 6.9 Environmental Statement Chapter 9 – Contaminated Land, Geology and Hydrogeology [APP-181] concluded that neither groundwater levels nor groundwater receptors would be impacted by construction of above ground infrastructure, open cut trenching and trenchless crossing (paras 9.7.21 – 9.7.25). Therefore, it is concluded that groundwater levels beyond the Order Limits will not be impacted and by extension the environment of any potential archaeological remains will remain unchanged. The Applicant fully recognises the importance of safeguarding archaeological remains of national significance, and our approach is aligned with this

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			principle. The approach set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and secured through Requirement 5 within 3.1 Draft Development Consent Order [APP-056] already includes provision for a range of evaluation and mitigation strategies, including preservation in situ, should highly significant remains be identified.
10.5.28	Braintree District Council	Two protected lanes of possible medieval date are located within the Order Limits and therefore potentially impacted by the Project. Negative impacts are anticipated on their significance from construction; in order to provide access or for underground cabling. While reinstatement of any lost trees/hedgerow following the completion of construction will assist in offsetting this negative impact, more certainty is required about the recording and monitoring of this impact.	Section 7.9 of 7.4 Outline Landscape and Ecological Management Plan [Revision C] sets out commitments to retain protected lanes wherever possible. Section 9.8 already includes provision for reinstatement of protected lanes, include vegetation, earthworks and other boundary features and for pre-construction photographs to be taken to ensure a record is available to inform any reinstatement. Commitment H06 in 7.2 Outline Code of Construction Practice [Revision B] to be issued at Deadline 2 is proposed to be updated to: <i>‘Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). To support this approach, a topographic survey will be undertaken in advance of works/impacts to each Protected Lane (Essex) and Historic Lane (Suffolk) within the Order Limits, where likely to be affected by physical works. The survey will include mapping of any historic earthwork features associated with the Protected / Historic Lane, including associated banks and ditches. During construction, the contractor will seek to limit the working area at the narrower sections of impacted lanes, to that which is practicable for the</i>

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			<i>works to be delivered. Any historic features associated with the lane will be reinstated at the end of construction activities to the pre-work condition, including the reinstatement of hedgerow margins and historic earthworks. Where such features cannot be retained, compensatory design elements will be provided as appropriate (including hedgerows, fences, walls and earthworks).'</i>
10.6.5	Braintree District Council	Cumulative Effects – Above ground heritage assets ...the Council would highlight that the combination of the permitted solar farm on Land West of Park Road, Rivenhall (Braintree planning reference: 21/03735/FUL) will result in a rather notable change of character to this landscape which could be assessed in greater detail. The appeal decision for this application noted that the proposal will cause less than substantial harm to the significance of the listed buildings at Rivenhall Place. 10.6.6 Were both schemes built out, the combination of the solar farm with the Applicants proposals, would result in a higher level of less than substantial harm than the applicant has identified (Lower Less Than Substantial Harm, p147 of document APP-215).	A cumulative assessment was undertaken, as set out in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. No significant cumulative effects were identified for any designated assets location within Braintree as set out in paragraphs 17.5.49-52. The Applicant considers this assessment to be appropriate for the reasons set out in the assessment.
10.6.7 - 12	Braintree District Council	Cumulative Effects – Below ground heritage assets ...within Braintree District a further National Grid project is planned for construction over similar timescales. The National Grid Bramford to Twinstead Reinforcement (2024) requires the construction and operation of a new 400 kilovolt (kV) electricity	The Bramford to Twinstead Reinforcement Project only falls within the Historic Environment Zone of Influence (Zol) of 3 km near Bramford Substation and not where the two projects are located within Braintree (6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]). Consequently, there would not be

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		transmission line over a distance of approximately 29km. It comprises approximately 18km of overhead line and around 11km of underground cable. Much of the underground cabling lies within the Braintree District and crosses the Stour Valley where significant archaeological remains may be preserved, based on the information held on the Essex Historic Environment Record. The archaeological mitigation for this project is currently being undertaken and further mitigation is proposed. No significant inter-project cumulative effects have been identified as part of the assessment. The reasoning for this is expanded in Section 17.5.52 (APP-281) which states: <i>‘While there would be overlap of the Order Limits for other developments and the Project, effects to archaeology would only occur once by whichever construction would take place first. These effects would be mitigated as appropriate and agreed with the LPA (such as through excavation, recording, and publication). Any affected archaeology would be removed as a result of the mitigation/construction and therefore the inter-project effects for construction and operation (and maintenance) would be negligible and not significant’.</i> The Council consider that this statement is incorrect as the cumulative effects would be derived from the increase in land take across the combined Order Limits of both or more projects, and not from overlap. The cumulative impact of the project would be because of the increase in the total area of land take and not overlap, and therefore the scale of potential	a cumulative impact to below ground heritage assets within Braintree.

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		archaeological remains which could be lost as a result of the mitigation/construction is increased. Archaeological remains are a finite and non-renewable resource. This cumulative impact may not be determined as significant through the process of the assessment but should be considered an adverse effect of the project wherever archaeological remains are removed due to truncation from construction activities. As the nature of the archaeological remains that may be affected is currently unknown the impact and significance cannot be determined effectively through this form of assessment. While mitigation by record may reduce the cumulative impact in EIA terms, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted (NPPF, 2024 Paragraph 218).	
10.8.17	Braintree District Council	Outline Code of Construction Practice (CoCP) In addition, no structures or buildings have been identified where there is the potential for damage from vibration from potential piling activities. This is agreed, however construction Noise and Vibration Mitigation measures NV04 and NV05 should be put in place to avoid damage to designed heritage assets rather than rectifying any damage arising from the works after the fact. Site specific measures should be set out in the Main Works Contractor(s) Noise and Vibration Management Plan as set out in NV05 and agreed prior to relevant works commencing.	Commitments NV01, NV02, NV03, NV04, NV05, and NV20 in 7.2 Outline Code of Construction Practice [Revision B] all address this point. These ensure measures will be put in place first to avoid impacts from vibration. NV04 provides a means to repair damage in the highly unlikely event it occurs. The pre-condition surveys committed to in NV04 are an important element to ensure there is a check against which any concerns regarding damage can be measured.
10.8.18 - 21	Braintree District Council	Outline Code of Construction Practice (CoCP)	Commitment H04 in 7.2 Outline Code of Construction Practice [Revision B] to be issued at

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		...standard and additional mitigation measures for archaeology are also set out in the Outline CoCP (APP-300). Mitigation requirements are included within Section 6 (6.1.13) of the outline CoCP with reference to the Outline AMS and WSI (APP-328) and mitigation measures listed in Table 6.1. Register of Environmental Commitments. Historic Environment (archaeology) is covered under H01 to H05 and are agreed as appropriate. H04 should add: <i>‘The Principal Contractor(s) will be responsible for making sure staff are aware of what to do in the event of an unexpected heritage asset. This should include toolbox talks within site inductions’.</i> Mitigation for Protected Lanes is included under H06. In order to protect the historic features of the protected lane a permanent record should be completed prior to any changes which would allow more accurate re-instatement. The requirement for this should be included under H06 and the mode and mechanism for this process included in the final Landscape and Ecological Management Plan (LEMP). It is noted that the measures proposed by the National Grid Bramford to Twinstead project (H05) included a more robust mechanism for their protection. It is recommended that this measure is adopted. See below: <i>‘A topographic survey will be undertaken in advance of construction of each Protected Lane (Essex) and Historic Lane (Suffolk) within the Order Limits where likely to be affected by physical works. The survey will include mapping of any historic earthwork</i>	Deadline 2 is proposed to be updated to include this additional wording: <i>‘The Principal Contractor(s) will be responsible for making sure staff are aware of what to do in the event of an unexpected heritage asset. This should include toolbox talks within site inductions.’</i> The 7.4 Outline Landscape and Ecological Management Plan [Revision C] includes measures to retain and reinstate historic landscape features including protected lanes, in addition to the commitment set out in H06 of 7.2 Outline Code of Construction Practice [Revision B]. Commitment H06 in 7.2 Outline Code of Construction Practice [Revision B] to be issued at Deadline 2 is proposed to be updated to: <i>‘Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). To support this approach, a topographic survey will be undertaken in advance of works/impacts to each Protected Lane (Essex) and Historic Lane (Suffolk) within the Order Limits, where likely to be affected by physical works. The survey will include mapping of any historic earthwork features associated with the Protected / Historic Lane, including associated banks and ditches. During construction, the contractor will seek to limit the working area at the narrower sections of impacted lanes, to that which is practicable for the works to be delivered. Any historic features associated with the lane will be reinstated at the end of construction activities to the pre-work condition, including the reinstatement of hedgerow margins and historic earthworks. Where such features cannot be</i>

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		<i>features associated with the lane, including banks and ditches. During construction, the contractor will seek to limit the working area to the narrowest section of lane that is practicable for the works. Any historic features associated with the lane will be reinstated at the end of construction to the pre-work condition, including the replanting of hedgerows and reinstatement of historic earthworks’.</i>	<i>retained, compensatory design elements will be provided as appropriate (including hedgerows, fences, walls and earthworks).’</i>
10.8.22	Braintree District Council	Outline Landscape and Ecological Management Plan (LEMP) The Outline Landscape and Ecological Management Plan (LEMP) (APP-321) includes measures to protect and reinstate historic landscape features including protected lanes, in addition to the commitment set out in H06 of the Outline CoCP (APP-300). The plan does not include sufficient controls to ensure the accurate re-instatement of historic features should removal or changes be required during construction. The following should be added to Section 7.9: <i>7.9.2 - Should removal of features, other than hedgerows, associated with the protected lane be required, such as banks, verges, earthworks, a suitable method of recording of all historic features associated with the protected lane should be carried out in order to facilitate accurate re-instatement.</i>	Section 9.8 of 7.4 Outline Landscape and Ecological Management Plan [Revision C] already includes provision for reinstatement of protected lanes, include vegetation, earthworks and other boundary features and for pre-construction photographs to be taken to ensure a record is available to inform any reinstatement. Commitment H06 in 7.2 Outline Code of Construction Practice [Revision B] to be issued at Deadline 2 is proposed to be updated to: <i>‘Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). To support this approach, a topographic survey will be undertaken in advance of works/impacts to each Protected Lane (Essex) and Historic Lane (Suffolk) within the Order Limits, where likely to be affected by physical works. The survey will include mapping of any historic earthwork features associated with the Protected / Historic Lane, including associated banks and ditches. During construction, the contractor will seek to limit the working area at the narrower sections of impacted lanes, to that which is practicable for the works to be delivered. Any historic features associated</i>

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			<i>with the lane will be reinstated at the end of construction activities to the pre-work condition, including the reinstatement of hedgerow margins and historic earthworks. Where such features cannot be retained, compensatory design elements will be provided as appropriate (including hedgerows, fences, walls and earthworks).'</i>
10.9.1 – 2	Braintree District Council	Requirement 5 (Archaeology) The Requirement wording for Archaeology (Requirement 5) in the dDCO (APP-056) does not currently take into account the post-consent programme of archaeological trenching required, or secure timescales for delivery of the Post-Excavation Assessments. It is suggested that Article 5(4) in the dDCO is replaced with the wording below and an additional point, 5(5), is included. This will give clarity for sign-off (our proposed condition 5(4)) and also provide reassurance of a robust mechanism for securing both the field and post-excavation works. <i>Replaced Wording - 5 (4) Intrusive site preparation works must not take place until an archaeological or geoarchaeological written scheme(s) of investigation in accordance with the outline written scheme(s) of investigation as appropriate has been submitted to and approved by the discharging authority in consultation with Historic England. The archaeological or geoarchaeological written scheme(s) of investigation required under this subparagraph must be implemented as approved.</i> <i>Additional Wording - 5 (5) Unless otherwise agreed with the local planning authority:</i>	A response to this comment has been provided within the Draft Development Consent Order, Requirements and Management Plan section of this document.

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		(a) <i>No later than one year following the completion of the fieldwork specified in each site-specific written scheme of investigation, a site-specific post excavation assessment (PXA) for that site must be completed in accordance with the Written Scheme of Investigation and submitted to the local planning authority for approval.</i> (b) <i>No later than one year following the approval of the final site-specific post excavation assessment, an archaeological updated project design for all applicable sites, must be submitted to the local planning authority for approval. The archaeological updated project design must be produced in general accordance with the detailed Written Scheme of Investigation for each stage, include details of the scope of post-excavation analysis and publication and have regard to the site-specific research agendas set out in the site-specific written schemes of investigation.</i>	
10.10.1	Braintree District Council	Although no designated heritage assets lie within the Order Limits, the proposed development would affect the setting of numerous listed buildings and three conservation areas within Braintree District. In addition, the archaeological potential along the route is considered high, with both known and currently unknown below-ground heritage assets likely to be present.	See response to 10.3.2.
15.4.4 - 5	Braintree District Council	In relation to the historic environment (above ground), cumulative inter-project effects would result in increased harm to Rivenhall Place when considered alongside the consented solar farm development.	See response to 10.6.5.

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		In relation to the historic environment (below ground), significant cumulative effects would arise from the increased land take across combined Order Limits, resulting in impacts on archaeological remains, which are a finite and non-renewable resource.	
8.199	Chelmsford City Council	There are areas with permanent significant impacts are identified at Balls Farm, Great Waltham (1305428), Langleys Registered Park and Garden (1000241), Southwoods Farm, Writtle (1237420 and 1237421), Margaretting Hall (1152104), the Church of St Mary, Stock (listed grade II*, 1264434) and White's Tyrrells Farmhouse, Stock (1236733). No additional mitigation is proposed, but it is essential.	The Project would lead to less than substantial harm to these listed buildings. Embedded and standard mitigation proposals for listed buildings and conservation areas are set out in 7.2 Outline Code of Construction Practice [Revision B] and 7.4 Outline Landscape and Ecological Management Plan [Revision C]. The Project's mitigation strategy has been developed in consultation with heritage stakeholders, including the Council and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording. In addition to embedded and standard mitigation measures screening planting was considered for the historic environment and the conclusion reached that further planting would alter the existing setting of designated heritage assets, likely introducing harmful change, as set out in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. Given the assessment concludes at worst, less than substantial harm, and the mitigation hierarchy has been followed, NPS EN-1

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			(2024) does not require the Applicant to take any further measures.
8.201	Chelmsford City Council	Brickfields (1122129, identified as Bishops Hall Cottage) is a small C17/C18 thatched roof cottage. Its rural setting makes a moderate contribution to its significance. Its heritage value of medium is agreed. It is not agreed that its setting does not include the development consent area. The woodland screening to the south partly mitigates the impact, but not fully. It is considered there would be a low impact, resulting in a minor effect.	The impact of the Project on the setting of this asset 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 guidance⁶⁵. 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] describes the setting of the asset with which the council appears to agree. The Applicant disagrees with the council's conclusion that the asset's setting extends to the Order Limits and the council's subsequent assessment and considers that the interpretation and extent of the asset's setting presented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] is appropriate.
8.201	Chelmsford City Council	Goodmans Farmhouse (1122135) and Barn (1171336) – medium impact on setting (rather than low), due to the considerable change to the rural landscape with which it is historically associated with, existing trees do not fully mitigate the impacts, particularly in winter months. Resulting in a moderate effect, which is significant.	The impact of the Project on the setting of these assets 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. 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] describes the setting of the assets with which the council appears to agree. The Applicant disagrees with the council's conclusion of assessment and considers that the assessment of permanent minor adverse

⁶⁵ Historic England (2017) The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)

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			significance of effect (not significant) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Lower Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is appropriate as the rural landscape will remain in place beneath and around the proposed overhead line.
8.201	Chelmsford City Council	Stonage Farmhouse (1172474) and Barn (1122042) – low level of harm not agreed – medium level due to the change to the rural setting with which the buildings are historically associated, existing trees do not fully mitigate the impacts, particularly in winter months, resulting in a moderate effect, which is significant.	The impact of the Project on the setting of this asset 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 guidance⁶⁶. 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] describes the setting of the asset with which the Council appears to agree. The Applicant disagrees with the council's conclusion of assessment and considers that the assessment of permanent minor adverse significance of effect (not significant) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Lower Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is appropriate as the rural landscape will remain in place beneath and around the proposed overhead line.

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8.201	Chelmsford City Council	Chatham Hall (1338512) - low level of harm not agreed – medium level due the change to the rural setting, existing trees do not fully mitigate the impacts, particularly in winter months, as demonstrated in viewpoints HE8c and 16.16, resulting moderate effect, which is significant.	The impact of the Project on the setting of this asset 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 guidance⁶⁷. 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] describes the setting of the asset with which the Council appears to agree. The Applicant disagrees with the council's conclusion of assessment and considers that the assessment of permanent minor adverse significance of effect (not significant) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Lower Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is appropriate as the rural landscape will remain in place beneath and around the proposed overhead line.
8.201	Chelmsford City Council	Church of St Mary and St Laurence (1122058) Great Waltham is excluded. It is not agreed the setting does not extend to the order limits. The wider rural setting of the village is part of how the church is experienced and there are important views of the church tower from the north/northwest /northeast where the proposed pylons would be visible as a distant backdrop (as shown in visualisation HE15e), which would impact on how it is experienced as a rural	The impact of the Project on the setting of this asset 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 guidance⁶⁸. 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] describes the setting of the asset with which the Council appears to agree. The Applicant disagrees

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		village church. Due to the screening and distance the impact would be low to an asset of high significance, therefore resulting a moderate to minor effect, which is significant.	with the council's conclusion that the asset's setting extends to the Order Limits and the council's subsequent assessment and considers that the interpretation and extent of the asset's setting presented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] is appropriate.
8.201	Chelmsford City Council	Rose and Crown, Great Waltham (1122116) – low impact on setting (rather than negligible) resulting in a minor effect, due to change to rural setting with partial screening.	The impact of the Project on the setting of this asset 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. 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] describes the setting of the asset with which the Council appears to agree. The Applicant disagrees with the council's conclusion of assessment and considers that the assessment of permanent negligible adverse significance of effect (not significant) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Lower Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is appropriate as the rural landscape will remain in place beneath and around the proposed overhead line.
8.201	Chelmsford City Council	Lace cottage, Great Waltham (1122117) – medium impact (not low) due to change to rural setting with limited screening, resulting in a moderate effect, which is significant.	The impact of the Project on the setting of this asset was assessed in accordance with the methodology set out in 6.11 Environmental Statement Chapter 11 -

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			Historic Environment [AS-068] and in accordance with professional heritage sector guidance⁶⁹. 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] describes the setting of the asset with which the Council appears to agree. The Applicant disagrees with the Council's conclusion of assessment and considers that the assessment of permanent minor adverse significance of effect (not significant) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Lower Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is appropriate as the rural landscape will remain in place beneath and around the proposed overhead line.
8.201	Chelmsford City Council	Great Waltham Conservation Area (CA55) – There would be notable harm to the setting of the Conservation Area by erosion of its rural setting which makes a considerable contribution to its significance, resulting a medium level of harm (not low), which would amount to a moderate effect, which is significant.	The impact of the Project on the setting of this asset 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 guidance⁷⁰. 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] describes the setting of the asset with which the council appears to agree. The Applicant disagrees with the council's conclusion of assessment and considers that the assessment of permanent minor adverse significance of effect (not significant) (6.11.A2

⁶⁹ Historic England (2017) The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)

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			Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] and Lower Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is appropriate as the rural landscape will remain in place beneath and around the proposed overhead line.
8.201	Chelmsford City Council	Little Waltham Conservation Area (CA56) – There would be notable harm to the setting of the Conservation Area by erosion of its rural setting which makes a considerable impact on its significance, resulting a medium level of harm (not low), which would amount to a moderate effect, which is significant.	The impact of the Project on the setting of this asset 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 guidance⁷¹. 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] describes the setting of the asset with which the council appears to agree. The Applicant disagrees with the council's conclusion of assessment and considers that the assessment of permanent minor adverse significance of effect (not significant) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] and Lower Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is appropriate as the rural landscape will remain in place beneath and around the proposed overhead line.

⁷¹ Historic England (2017) The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)

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8.201	Chelmsford City Council	Balls Farmhouse (1305428) – high impact on setting (rather than medium) due the comprehensive change to the rural landscape setting (i.e. see viewpoint HE16) which it is historically associated with and makes a considerable contribution to its setting, resulting in a major/moderate effect, which is significant.	The impact of the Project on the setting of this asset 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 guidance⁷². 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] describes the setting of the asset with which the council appears to agree. The Applicant disagrees with the council's conclusion of assessment and considers that the assessment of permanent moderate adverse significance of effect (not significant) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Mid Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is appropriate as the rural landscape will remain in place beneath and around the proposed overhead line.
8.201	Chelmsford City Council	1 and 2 Larks Lane, Great Waltham (1122083). low impact (rather than none) due to impact rural setting, resulting in a minor effect.	The impact of the Project on the setting of this asset 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 guidance⁷³. 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] describes the setting of the asset with which the council appears to agree. The Applicant disagrees with the council's conclusion that the asset's setting extends

⁷² Historic England (2017) The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)

⁷³ Historic England (2017) The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)

ID	Stakeholder	Comment	NG Response
			to the Order Limits and the council's subsequent assessment and considers that the interpretation and extent of the asset's setting presented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] is appropriate.
8.201	Chelmsford City Council	Vault West of Partridge Green Farm (1306289) – considerable to change to the sense of an isolated rural setting, giving a medium impact on setting (rather than low), resulting in a medium effect which is significant.	The impact of the Project on the setting of this asset 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 guidance⁷⁴. 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] describes the setting of the asset with which the council appears to agree. The Applicant disagrees with the council's conclusion of assessment and considers that the assessment of permanent minor adverse significance of effect (not significant) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Lower Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is appropriate as the rural landscape will remain in place beneath and around the proposed overhead line.
8.201	Chelmsford City Council	Coptfold Hall Barn (1247784) – medium impact (rather than low) due to impact on the rural setting with which the asset is historically associated, even with partial screening by adjacent modern	The impact of the Project on the setting of this asset was assessed in accordance with the methodology set out in 6.11 Environmental Statement Chapter 11 -

⁷⁴ Historic England (2017) The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)

ID	Stakeholder	Comment	NG Response
		farm buildings, resulting a moderate effect, which is significant.	Historic Environment [AS-068] and in accordance with professional heritage sector guidance⁷⁵. 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] describes the setting of the asset with which the council appears to agree. The Applicant disagrees with the council's conclusion of assessment and considers that the assessment of permanent minor adverse significance of effect (not significant) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Lower Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is appropriate as the rural landscape will remain in place beneath and around the proposed overhead line.
8.204	Chelmsford City Council	Protected Lane: Boreham Road (Great Leighs), Newney Green (Writtle), Scurvey [sic] Hall Lane (Great Waltham) Nathans Lane (Highwood) and Ivy Barns Lane (Margaretting) are agreed to be of low value, but with a low magnitude of impact resulting due the change to their settings, resulting in a negligible effect.	As a low value asset, the setting of the Protected Lane was not considered. All non-designated heritage assets were assessed to determine their value in accordance with the 6.19 Scoping Report [APP-288 to APP-296], 6.20 Scoping Opinion [APP-297] and the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Those assets assessed to have a low or negligible value and located outside the Order Limits did not have a settings assessment undertaken. As they would not experience physical impacts there is no potential for significant effects as a result of change to setting for assets of these values. While some harm

⁷⁵ Historic England (2017) The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)

ID	Stakeholder	Comment	NG Response
			would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. In National Policy Statement (NPS) EN-1 (2024), instructions regarding the Applicant's assessment state (paragraph 5.9.9) ' <i>The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES</i> ' and in several places refer to detail being proportionate to the importance/significance of the heritage asset. The Applicant therefore considers that it has appropriately complied with relevant policy in the NPS (EN-1 (2024)) regarding assessment of impacts to non-designated heritage assets.
8.205	Chelmsford City Council	Protected Lane: Larks Lane (Great Waltham) is agreed to be of low value, but it is considered there would be a medium impact on its significance because the pylon routes influences much of the length of the lane and how it is experienced in a rural landscape, resulting in a minor effect.	See response to 8.204.
8.207	Chelmsford City Council	Coptfold Hall has a designed landscaped [sic] originating from the eighteenth and nineteenth centuries, including woodlands, agricultural land, gardens and historic buildings. It is included on the Essex Gardens Trust Register of Designed Landscapes and should be considered as a non-designated heritage asset in accordance with Chelmsford Local Plan Policy DM14. The proposed route passes directly through the landscape and its heritage value should be acknowledged. The landscape is considered to be of low heritage value,	The Essex Gardens Trust Register of Designed Landscapes is not included on the list of agreed sources as noted in 6.19 Scoping Report [APP-288 to APP-296] , 6.20 Scoping Opinion [APP-297] , 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] . As a low value asset, however, the setting of the designed landscape would not have been considered.

ID	Stakeholder	Comment	NG Response
		the impacts high, resulting in permanent significant impacts of a moderate level, together with impacts on the setting of the listed barn and non-designated farmhouse.	All non-designated heritage assets were assessed to determine their value in accordance with the 6.19 Scoping Report [APP-288 to APP-296] , 6.20 Scoping Opinion [APP-297] and the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] . Those assets assessed to have a low or negligible value and located outside the Order Limits did not have a settings assessment undertaken. As they would not experience physical impacts there is no potential for significant effects as a result of change to setting for assets of these values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. In National Policy Statement (NPS) EN-1 (2024), instructions regarding the Applicant's assessment state (paragraph 5.9.9) ' <i>The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES</i> ' and in several places refer to detail being proportionate to the importance/significance of the heritage asset. The Applicant therefore considers that it has appropriately complied with relevant policy in the NPS (EN-1 (2024)) regarding assessment of impacts to non-designated heritage assets.
8.208	Chelmsford City Council	A group of WWII pillboxes and archaeological remains of WWII defensive features forming part of the GHQ defence line are adjacent the proposed route between Little Waltham and Great Waltham. The assessment identifies these as being of low value individually, but a group of medium value. Their	The Council's comment possibly relates to a pre-submission version of 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] which was shared for comment; the version submitted at DCO in September and referenced here treats the seven WWII pillboxes

ID	Stakeholder	Comment	NG Response
		setting is not assessed, only their historic interest. It is considered the group value, intervisibility and overlapping lines of fire, together with the rural setting contribute to the setting of and significance of the pillboxes. The close proximity of the proposed route would impact on their setting, even taking account of the B1008. With a medium value and medium impact, resulting in a moderate effect, which is significant.	and the General Headquarters Defence Line as a single medium value heritage asset and assesses its setting. 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] describes the setting of the asset with which the council appears to agree. The Applicant disagrees with the council's conclusion of assessment and considers that the assessment of permanent negligible adverse significance of effect (not significant) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Lower Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is appropriate.
8.209 – 8.210	Chelmsford City Council	In addition to those buildings on the local list, other non-designated built heritage assets within the 250m zone should also be identified and assessed. This is particularly important where the local list does not currently cover relevant parishes – Great Leighs, Great Waltham, Little Waltham, Stock, Margaretting and Roxwell. The following non-designated heritage assets should be included within the assessment: [...]	Non-designated historic buildings were identified in addition to those included in the HER and Local Lists. This was primarily through historic mapping. The methodology for desk-based research and walkover included identification of any previously unknown heritage assets, including historic buildings. The source for the 51 non-designated heritage assets listed in the bullet points introduced by paragraph 8.210 is unknown and is not included on the list of agreed sources as noted in 6.19 Scoping Report [APP-288 to APP-296] , 6.20 Scoping Opinion [APP-297] , 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] ; therefore they have not been considered in 6.11.A1 Environmental

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			Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] or 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The Applicant has reviewed the 51 non-designated assets listed in the LIR and nine are of low value and outside the 250 m study area: these assets would, therefore, be discounted from inclusion in the baseline report as per the agreed methodology presented in the DCO documentation noted above. Five more of the non-designated assets are located within 250 m of a Project permanent access route but further than 250 m from other elements of the Order Limits. As the permanent access routes will not result in any physical impacts on the landscape these five assets would have again been discounted from the assessment based on the agreed methodology. Of the remaining 37 non-designated assets 34 have been assessed as being of low value by Chelmsford City Council (CCC) and these are located within the 250 m study area. Although not included by any of the identified sources noted in the DCO documentation noted above, the Applicant has reviewed the 34 assets and as low value assets within the 250 m study area they would have been included in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209], but would have been scoped out at this stage and not considered in assessment for the reasons set out in response to paragraph 8.204. The remaining three non-designated heritage assets identified by the Council comprise WWII pillboxes in Great Waltham Parish (see response to para 8.208

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			above), the WWII Auxiliary Unit Operational Base, south of Goodmans Lane, and Albion House, Braintree Road. The WWII Auxiliary Unit Operational Base is also identified by the Essex HER and was, therefore, included in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] and 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] as asset (6088). The Applicant's assessment of this high value asset concludes that the Project would have a low adverse magnitude of impact on the asset resulting in a direct, permanent minor adverse significance of effect on the asset (not significant). CCC concludes that (6088) would experience a medium [adverse magnitude of] impact resulting in major/moderate [significance of] effect, which is significant. Upon review, the Applicant disagrees with CCC's conclusion because the rural setting is not integral to the function nor understanding of the asset, and as the asset is entirely underground, concealed intentionally, and was originally located within woodland, open views to and from the asset are not given particular weight. The Applicant, therefore, considers that the assessment of permanent minor adverse significance of effect (not significant) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Lower Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is appropriate.

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			CCC's assessment of Albion House attributes medium value and concludes a medium [adverse magnitude of] impact, giving a moderate [significance of] effect, which is significant. The Applicant has reviewed this assessment and disagrees with CCC's conclusions. Available satellite imagery as well as 19th century OS mapping indicates the asset has had large grounds to the rear (west) in the direction of the Order Limis with open views to farmland to the east. The grounds are defined by mature tree lined boundaries and contain further tree cover. The Order Limits are, therefore, partially screened by this vegetation from the asset and views to the Order Limits from Braintree Road are equally broken and interrupted. The Applicant, therefore, considers that of an assessment of permanent minor adverse significance of effect (not significant) resulting from a low adverse magnitude of impact is appropriate.
8.238	Chelmsford City Council	The intrusive fieldwork stage of the archaeological assessment will not be completed before the end of the examination period and the results of the evaluation will not be available for review prior to determination of the application. As such, the application fails to include sufficient supporting evidence from the field evaluations carried out within Essex. NGET has failed to fully comply with the policy set out in paragraph 5.9.11 with regards to archaeology and geoarchaeology and National Planning Policy Framework (NPPF) Paragraph 207 (2024).	The archaeological evaluation work (geophysics and trial trenching) has continued since the submission of the application for development consent, continuing the Applicant's commitment to the historic environment potentially affected by the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] to 6.11.F6 Environmental Statement Figure 11.6 - Phase 2 Geophysical Survey Preliminary Results [AS-083], of which the historic environment stakeholders are aware. At this stage approximately 3,000 trial trenches and 1,650 ha of geophysical survey have been completed. This information included further priority

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			geophysical survey and trial trenching results, and preliminary results of part of the Phase 2 geophysical survey. The Phase 2 stage of the geophysical survey and trial trenching will continue throughout 2026, and all the results of this work will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed at monthly meetings and set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. The vast majority of the priority geophysical survey and trial trenching are complete and included in the Supplementary Environmental Information. The fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State.
8.244	Chelmsford City Council	Changes to the local water and burial environment could alter the preservation of archaeological sites within and beyond the development areas.	Geoarchaeological monitoring of Ground Investigation works at three locations with high potential for geoarchaeological remains and potential impact from the Project took place prior to submission and the results of this work, including deposit models, are included in 6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]. Provision for further geoarchaeological work is included in the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], which will be updated in consultation with Local Planning Authority

ID	Stakeholder	Comment	NG Response
			Archaeological Advisors to consider any detailed comments provided in Local Impact Reports. 6.9 Environmental Statement Chapter 9 – Contaminated Land, Geology and Hydrogeology [APP-181] concluded that neither groundwater levels nor groundwater receptors would be impacted by construction of above ground infrastructure, open cut trenching and trenchless crossing (paras 9.7.21 – 9.7.25). Therefore, it is concluded that groundwater levels beyond the Order Limits will not be impacted and by extension the environment of any potential archaeological remains will remain unchanged. The Applicant fully recognises the importance of safeguarding archaeological remains of national significance, and our approach is aligned with this principle. The approach set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and secured through Requirement 5 within 3.1 Draft Development Consent Order [APP-056] already includes provision for a range of evaluation and mitigation strategies, including preservation in situ, should highly significant remains be identified.
8.245	Chelmsford City Council	Deeper impacts, such as at Horizontal Directional Drilling (HDD) locations and piling for pylon bases could impact geoarchaeological sediments.	Provision for further geoarchaeological work is included in the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], which will be updated in consultation with Local Planning Authority Archaeological Advisors to consider any detailed comments provided in Local Impact Reports.

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8.250 – 8.255	Chelmsford City Council	Despite the adequacy of desk-based research, the level of information submitted with the application fails to provide sufficient information on the nature, extent and significance of heritage assets in order to determine the impact on archaeological remains by the proposed scheme. This is due to factors such as incomplete coverage of the geophysical survey and trial trench evaluation, lack of intrusive investigation to allow corroboration of the geophysical survey and lack of reporting on the trial trench evaluations that have been completed. The archaeological potential of the proposed scheme area is not understood to the required level, and previously unknown archaeological remains may be present within the proposed scheme area. A high percentage of the land within the scheme remains under investigated and therefore the risk of encountering high value heritage assets remains a significant risk. The assessment has followed the EIA methodology (APP-135) to determine the impact on archaeological remains listed in the Historic Environment Baseline Report (APP 209) and assigned values based largely on desk-based research. Establishing the ‘value’ and significance of below ground archaeological remains and deeply buried geoarchaeological deposits requires evaluation (geophysical survey, trial trenching, coring, and deposit modelling), as required by EN-1. For this reason, the ‘value’ of many of the archaeological remains listed is unsubstantiated and the assessment methodology cannot be effectively	The archaeological evaluation work (geophysics and trial trenching) has continued since the submission of the application for development consent, continuing the Applicant's commitment to the historic environment potentially affected by the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] to 6.11.F6 Environmental Statement Figure 11.6 - Phase 2 Geophysical Survey Preliminary Results [AS-083], of which the historic environment stakeholders are aware. At this stage approximately 3,000 trial trenches and 1,650 ha of geophysical survey have been completed. This information included further priority geophysical survey and trial trenching results, and preliminary results of part of the Phase 2 geophysical survey. The Phase 2 stage of the geophysical survey and trial trenching will continue throughout 2026, and all the results of this work will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed at monthly meetings and set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. The vast majority of the priority geophysical survey and trial trenching are complete and included in the Supplementary Environmental Information. The value of the archaeological remains identified by the fieldwork was assessed and where appropriate the value determined by desk-based research was updated. This was included in the submission documents for fieldwork completed pre-submission and updated in the Supplementary Environmental

ID	Stakeholder	Comment	NG Response
		used on all of the assets listed in the historic environment baseline report. There is general agreement with the assessment of residual effects for archaeological remains of both designated and non-designated status where they are considered significant. Yet without further information from the results of intrusive evaluation, the conclusions of the ES regarding what is significant in terms of residual effect cannot be fully determined. Specifically, those archaeological sites identified through cropmarks, finds scatters and geoarchaeological deposits. This information would be required to determine an appropriate mitigation strategy. Without further evaluation in areas where there is no record of archaeological remains, the potential presence of heritage assets or their significance remains difficult to assess to the required level. Further intrusive assessment by trial trenching and geoarchaeological assessment would provide clarity on significance and reduces Project risk.	Information (6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) Results will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed at monthly meetings and will be set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. The fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State.
8.256	Chelmsford City Council	A number of Protected Lanes have been identified within the Order Limits. Negative impacts are anticipated on their significance from construction; in order to provide access or for underground cabling. While reinstatement of any lost trees/hedgerow following the completion of construction would assist in offsetting this negative impact, more certainty is required about the recording and monitoring of this impact.	See comment on paragraphs 8.281 – 2.

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8.279 - 80	Chelmsford City Council	Outline Code of Construction Practice (CoCP) Historic Environment (archaeology) is covered under H01 to H05 and are agreed as appropriate. H04 should add <i>“The Principal Contractor(s) will be responsible for making sure staff are aware of what to do in the event of an unexpected heritage asset. This should include toolbox talks within site inductions.”</i>	Commitment H04 in 7.2 Outline Code of Construction Practice [Revision B] to be issued at Deadline 2 is proposed to be updated to include this additional wording: <i>‘The Principal Contractor(s) will be responsible for making sure staff are aware of what to do in the event of an unexpected heritage asset. This should include toolbox talks within site inductions.’</i>
8.281 – 2.282	Chelmsford City Council	Mitigation for Protected Lanes is included under H06. In order to protect the historic features of the protected lane a permanent record should be completed prior to any changes which would allow more accurate re-instatement. The requirement for this should be included under H06 and the mode and mechanism for this process included in the final Landscape and Ecological Management Plan (LEMP). It is noted that the measures proposed by the National Grid Bramford to Twinstead Project (H05) included a more robust mechanism for their protection. It is recommended that this measure is adopted. See below: <i>“A topographic survey will be undertaken in advance of construction of each Protected Lane (Essex) and Historic Lane (Suffolk) within the Order Limits where likely to be affected by physical works. The survey will include mapping of any historic earthwork features associated with the lane, including banks and ditches. During construction, the contractor will seek to limit the working area to the narrowest section of lane that is practicable for the works. Any historic features associated with the lane will be reinstated at the end of construction to the pre-work</i>	7.4 Outline Landscape and Ecological Management Plan [Revision C] includes measures to retain and reinstate historic landscape features including protected lanes, in addition to the commitment set out in H06 of 7.2 Outline Code of Construction Practice [Revision B]. Commitment H06 in 7.2 Outline Code of Construction Practice [Revision B] to be issued at Deadline 2 is proposed to be updated to: <i>‘Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). To support this approach, a topographic survey will be undertaken in advance of works/impacts to each Protected Lane (Essex) and Historic Lane (Suffolk) within the Order Limits, where likely to be affected by physical works. The survey will include mapping of any historic earthwork features associated with the Protected / Historic Lane, including associated banks and ditches. During construction, the contractor will seek to limit the working area at the narrower sections of impacted lanes, to that which is practicable for the works to be delivered. Any historic features associated</i>

ID	Stakeholder	Comment	NG Response
		<i>condition, including the replanting of hedgerows and reinstatement of historic earthworks.”</i>	<i>with the lane will be reinstated at the end of construction activities to the pre-work condition, including the reinstatement of hedgerow margins and historic earthworks. Where such features cannot be retained, compensatory design elements will be provided as appropriate (including hedgerows, fences, walls and earthworks).’</i>
6.21	Brentwood Borough Council Local Impact Report Norwich to Tilbury 400kV Grid Reinforcement Application by National Grid Electricity Transmission (NGET)	From the Heritage principles overview for the Framework Masterplan, one of its key aims has been rendered undeliverable because of the proposal. The retention of key views across the site, including those towards and between the Church of St Mary just beyond the eastern boundary of the site (so as to not occlude the view from the development in the foreground and middle ground southwest of the site) is a key heritage design feature. However, the proposed alignment of the OHL in the southeast corner of DHGV would interrupt the safeguarded sightlines and adversely impact the view of the Church, contrary to the stated design principle as well as to the SPD and Holford Rule 7	The Applicant has considered alternative design solutions to position the pylon (which is to the west of the gas pipeline) further north or south. Either change requires an additional pylon and more directly reduces the area of development plots within the Dunton Hills Garden Village area. The historic environment assessment concluded a moderate adverse (significant) effect during construction and operation (and maintenance) phases for the grade II listed Church of St Mary (1122253) and Dunton Hall (1338380) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]) and a mid less than substantial harm conclusion for these listed buildings (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]). The assessment concluded no significant effects to other designated heritage assets in this area. The Applicant remains confident in the conclusions of the assessment given that the existing 132 kV PSC2-10 pylons would be removed and replaced with a smaller number of taller 400 kV pylons. Given the level of harm to the listed buildings does not constitute substantial harm, the Applicant’s position is

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			that this is not an unacceptable impact on the buildings nor on Dunton Hills Garden Village.
6.49 - 50	Brentwood Borough Council Local Impact Report Norwich to Tilbury 400kV Grid Reinforcement Application by National Grid Electricity Transmission (NGET)	Brentwood contains a number of both designated and non-designated heritage assets, including conservation areas and protected lanes, which are of high value to the Council and its residents. Designated heritage assets relevant to this report include: Scheduled Monuments: Barn at Ingatestone Hall; Moated Site east of Heron Hall. Grade I: Ingatestone Hall; Church of St Giles. Grade II*: Gatehouse and Courtyard Range at Ingatestone Hall; Granary near Ingatestone Hall; Church of All Saints; Granary near Heron Hall. Grade II: Sixteen listed buildings Hutton Village Conservation Area Little Hyde Lane Protected Lane With respect to these assets, whilst the ES has correctly recognised that they are medium or high value/sensitivity sites, it has only identified less than substantial, lower less than substantial or mid less than substantial harm during both construction and operation. BBC considers that it has not appropriately captured the magnitude of impact for either construction or operation.	6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Projects likely significant effects on designated and non-designated heritage assets in this area. The Project will not result in any substantial harm to designated heritage assets. The assessments have been informed by setting surveys by competent professionals. The Applicant considers the conclusions of assessment to be appropriate for the reasons set out in assessments. Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets during both construction and operation phases. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the SoS, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the NPSs. Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction

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			of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provides that the Secretary of State will take as a starting point that CNP infrastructure meet any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.
6.51	Brentwood Borough Council Local Impact Report Norwich to Tilbury 400kV Grid Reinforcement Application by National Grid Electricity Transmission (NGET)	In light of the above, BBC considers that impacts on the borough's designated assets will independently be substantial rather than a variation of less than substantial, but that in the context of the cumulative effect of pylons, haul roads and associated infrastructure, this will further materially degrade the historic setting of these assets. An example of this can be seen in the map below, which indicates that this section of the route through Haverings Grove and to the north of it will have a severely detrimental impact on the setting of a cluster of listed buildings, rather than individual impacts alone, as well as on Hutton Village Conservation area.	A Cumulative Effects assessment was undertaken, as set out in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. No significant cumulative effects were identified for any designated assets located within Brentwood, including the cluster of listed buildings and the Hutton Village Conservation Area, as set out in paragraphs 17.5.49 to 17.5.52. Regarding the impact assessed to Hutton Village conservation area and associated listed buildings, a section of the existing PUB 132 kV overhead line would be removed and replaced with the taller 400 kV overhead line. For this reason the Applicant considers the conclusions of assessment to be appropriate.

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6.52	Brentwood Borough Council Local Impact Report Norwich to Tilbury 400kV Grid Reinforcement Application by National Grid Electricity Transmission (NGET)	In addition to the above, BBC remains concerned that contrary to NPS EN-1 paragraphs 5.9.7 and 5.9.33, the ES has not adequately assessed the setting impacts on non-designated built heritage assets, including locally listed buildings and historic farmsteads, as well as Little Hyde Lane Protected Lane, part of which is directly within the Order Limits (identified but not assessed in terms of its setting). BBC considers that this omission prevents a fully informed and balanced judgment on overall levels of harm and significance.	The Applicant has previously responded to Brentwood Borough Council's comment regarding the assessment of locally listed buildings and historic farmsteads. For greater precision, the Applicant adds that the protected lanes are part of the non-designated heritage assets which have been assessed. Their value assessment is in accordance with 6.19 Scoping Report – Appendix A [APP-288 to APP-296], 6.20 Scoping Opinion [APP-297] and the methodology sets out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The Applicant has sought to reduce, as far as practicable, impacts on protected lanes through routing and siting and an ongoing iterative design process which has taken on board feedback at different stages of the Project. Further details on the impact of the Project on protected lanes can be found in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. 7.4 Outline Landscape and Ecological Management Plan [Revision C] includes measures to protect and reinstate historic landscape features including protected lanes, in addition to the commitment set out in H06 of 7.2 Outline Code of Construction Practice [Revision B]. The protected lanes were assessed to have a low or negligible value. As they would not experience physical impacts there is no potential for significant effects as a result of change to setting for assets of these

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			values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. National Policy Statement (NPS) EN-1 (2024) provides instructions regarding the Applicant's assessment in paragraph 5.9.9: <i>'The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES'</i>. In several places, NPS EN-1 (2024) refers to detail being proportionate to the importance/significance of the heritage asset. The Applicant therefore considers that it has appropriately complied with relevant policy in NPS EN-1 (2024) regarding assessment of impacts to non-designated heritage assets including the protected lanes.

4.10 Water Environment (Hydrology, Land Drainage and Flood Risk)

Introduction

- 4.10.1 Assessment of effects on Hydrology, Land Drainage and Flood Risk (**6.12 Environmental Statement Chapter 12: Hydrology, Land Drainage and Flood Risk [APP-221]**) have been undertaken in accordance with the **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** and in line with the requirements of national and local policy and guidance. Assessments have been scoped through engaging with the Environment Agency and the Lead Local Flood Authorities (LLFAs) and have been informed by a range of data sources, including outputs from Environment Agency flood models.
- 4.10.2 **7.9 Flood Risk Assessment [APP-331]**, and **7.10 Water Framework Directive Assessment [APP-332]**, have been reviewed by the Environment Agency and the LLFAs prior to submission and their feedback has been incorporated into the documents. General agreement has also been reached regarding the conclusions of these assessments.
- 4.10.3 As identified within the submitted Local Impact Reports, the key areas of disagreement remain around proposals to manage surface water runoff from the Project. Further information on these proposals was provided by the Applicant at Deadline 1 in **8.2 Drainage Strategy DCO [REP1-072]** and the Applicant will continue to engage with key stakeholders with regard to drainage matters. These matters have also been responded to through the SoCG process and we will continue to engage with the host authorities to reach further areas of agreement where possible.

Local Authority Positions

- 4.10.4 All Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 4.17 Water Environment (Hydrology, Land Drainage and Flood Risk) - Local Impact Report coverage

Local Authority	LIR sections covering this topic
Norfolk County Council	Section 10 (see the table below for detailed responses to paragraphs 10.8 – 10.16)
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	Section 11 and Table 9 (see the table below for detailed responses to paragraphs 11.38 – 11.40, 11.43, 11.45, 11.51 - 11.57, Table 9)
Essex County Council	Section 4.7

Local Authority	LIR sections covering this topic
	(see the table below for detailed responses to paragraphs 4.7.20 – 4.7.24, 4.7.26)
Thurrock Council	Sections 6.9, 6.10 and 6.11 (see the table below for detailed responses to paragraphs 6.9.3, 6.9.51 - 6.9.54, 6.10.15, 6.10.16, 6.11.19)
South Norfolk District Council	Section 9.5 (see the table below for the detailed response to paragraph 9.5.1)
Tendring District Council	Section 16 (see the table below for detailed responses to paragraphs 16.5, 16.6, 16.8, 16.12, 16.19)
Colchester City Council	Section 11 (see the table below for detailed responses to paragraphs 11.20 - 11.23, 11.25, 11.27, 11.28)
Braintree District Council	Section 17.5
Chelmsford City Council	Paragraph 8.580
Brentwood Borough Council	Sections 1.7 and 2.14

- 4.10.5** The Applicant has engaged extensively with Local Authorities on matters relating to Hydrology, Land Drainage and Flood Risk. This is reported in detail in Statements of Common Ground (SoCGs) (see Table 1.1 for Examination Library references). Within the SoCGs, matters are categorised as Agreed, Not Agreed or Under Discussion.
- 4.10.6 Each SoCG includes a table listing each environmental topic chapter in the Environmental Statement. Under each environmental topic chapter subheading, are a list of seven categories which are aligned with how the Environmental Impact Assessment was undertaken.
- 4.10.7 The bullet points below (split by category) provide a summary of where agreements are currently up to with the host Local Authorities relating to Hydrology, Land Drainage and Flood Risk (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG). Only four of the twelve Local Authorities' SoCGs contain matters relating to Hydrology, Land Drainage and Flood Risk.
- Matters relating to EIA – Regulatory, Planning Policy Context and Guidance are under discussion with 3/4 Local Authorities
 - Matters relating to EIA – Approach and Methods are under discussion with 2/4 Local Authorities
 - Matters relating to EIA – Baseline Conditions are under discussion with 2/4 Local Authorities
 - Matters relating to EIA – Embedded, Standard and Additional Mitigation Measures are under discussion with 3/4 Local Authorities

- Matters relating to EIA – Assessment Conclusions are under discussion with 4/4 Local Authorities
- Matters relating to Draft DCO / Outline Management Plans / Mitigation and Monitoring are under discussion with 3/4 Local Authorities.
- Other matters relating to Hydrology, Land Drainage and Flood Risk are under discussion with 4/4 Local Authorities.

4.10.8 The table below reflects the category (agreed, under discussion, not agreed), most frequently recorded across the SoCGs for each of the 13 Local Authorities relating to Hydrology, Land Drainage and Flood Risk (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG).

Image 4.6 Water Environment (Hydrology, Land Drainage and Flood Risk) - Categorisation of Matters in Statements of Common Ground

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Condition	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring	Other matters as required
Norfolk County Council	Under discussion	Agreed	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion
Suffolk County Council	Under discussion	Under discussion	Agreed	Agreed	Under discussion	Under discussion	Under discussion
Essex County Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion
Thurrock Council	Agreed	Agreed	Agreed	Under discussion	Under discussion	Under discussion	Under discussion
South Norfolk Council	-	-	-	-	-	-	-
Babergh and Mid Suffolk Councils	-	-	-	-	-	-	-
Tendring District Council	-	-	-	-	-	-	-
Colchester City Council	-	-	-	-	-	-	-

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Condition	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring	Other matters as required
Braintree District Council	-	-	-	-	-	-	-
Chelmsford City Council	-	-	-	-	-	-	-
Brantwood Borough Council	-	-	-	-	-	-	-
Basildon Borough Council	-	-	-	-	-	-	-

Responses to New Matters and Applicant Clarifications

- 4.10.9 The table below sets out the Applicant's response to the matters raised in the Local Impact Reports that the Applicant previously has not addressed in their documents, including Statements of Common Ground with Local Authorities or in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**.

Table 4.18 Water Environment (Hydrology, Land Drainage and Flood Risk) – Responses to New Matters and Applicant Clarifications

ID	Stakeholder	Comment	NG response
4.7.22	Essex County Council	A drainage strategy and liaison with the LLFA should take place at the earliest opportunity.	A Drainage Strategy has been produced and submitted at Deadline 1 (8.2 Drainage Strategy DCO [REP1-072]). The strategy provides additional information as to how negative effects on the land drainage regime and rainfall infiltration and runoff would be managed and controlled and also covers proposals for foul water management. The strategy report appends calculations to quantify runoff rates/discharge limits and the sizing of drainage storage and attenuation features.
6.9.51, 6.9.52	Thurrock Council	The Applicant must provide an adequate drainage strategy to demonstrate how peak runoffs and volumes generated from the site will be managed within the site and to ensure there is no increase in flood risk on site or elsewhere. The drainage strategy should include mitigation measures and design considerations to prevent any interception of overland flow paths by the proposed structures.	
11.23, 11.25		There is concern that information previously requested in respect of the control and management of surface water discharge has not been provided. The submitted FRA contains no specified discharge limits. Further, there are no details of how surface water will be managed when control limits are exceeded	
	Colchester City Council	NCC cannot agree with the applicant's finding of negligible negative effects on the land drainage regime and rainfall infiltration and runoff patterns as	

ID	Stakeholder	Comment	NG response
		set out in paragraph 12.8.24 of ES Chapter 12 – Hydrology Land drainage and Flood Risk. NCC has serious concerns about the omission of detailed drainage design annexes.	
10.9, 10.13	Norfolk County Council	The following topics require additional or expanded Requirements to ensure appropriate control during construction and operation: Drainage strategy, including surface and foul water management. The ES states that Surface Water Management Plans will later be prepared by contractors, but provides no location-specific mitigation for Tendring, nor modelling of increased runoff arising from haul road hard surfacing. TDC considers the lack of site-specific drainage detail a significant deficiency	
9.5.1	South Norfolk Council		
16.8, 16.12			

ID	Stakeholder	Comment	NG response
	Tendring District Council		
4.7.20	Essex County Council	Where construction takes place in flood zone 3 it should be ensured that surface water is not forced off site to increase the flood risk elsewhere.	As per commitment W07 in 7.2 Outline Code of Construction Practice (Revision B), where construction activities take place in Flood Zone 3, temporary construction compounds, laydown areas and other work sites would incorporate flood resilience measures where necessary. In addition, all qualifying works in Flood Zone 3 would require Flood Risk Activity Permits from the Environment Agency, as detailed in 5.5 Consents and Licences Required Under Other Legislation [APP-084]. As per commitment W09, where construction activities take place within surface water flood zones, including statutory undertaker works, prior to works commencing appropriate site drainage would be put in place to reduce the risk of standing water and avoid substantial delays to the construction programme, as well as to prevent off-site increases in surface water flood risk.
4.7.20	Essex County Council	Any work on or around a watercourse requires permission under Sect 23 of the Land Drainage Act 1991. Section 23 consent should be applied for timeously.	As per commitment W01 in 7.2 Outline Code of Construction Practice (Revision B) , qualifying works to ordinary watercourses would accord with the protective provisions within 3.1 Draft Development Consent Order [APP-056] agreed with the Lead Local Flood Authorities (LLFAs).
11.57	Suffolk County Council		

ID	Stakeholder	Comment	NG response
4.7.20	Essex County Council	The LLFA request that pylons are placed a minimum of 5 metres from the edge of a watercourse.	Commitment W20 in 7.2 Outline Code of Construction Practice (Revision B) secures that pylons would be a minimum of 3.5 m from the top of bank of any ordinary watercourses, with this distance having been set in accordance with Norfolk Lead Local Authority Developer Guidance ⁷⁶ . This is a minimum set-back distance and the Project would seek to maximise this buffer as much as is practicable.
4.7.20	Essex County Council	A Construction Management Plan is essential to detail how surface water will be managed during the construction phase. It should detail how surface will be stored during an event and where and how the surface water will be dealt with including treatment prior to be discharged at an appropriate rate.	Commitment GG22 in 7.2 Outline Code of Construction Practice (Revision B) secures that the Main Works Contractor(s) would prepare a Surface Water Management Plan. This plan would be substantially in accordance with 8.2 Drainage Strategy DCO [REP1-072] , submitted at Deadline 1, and would demonstrate how runoff across construction work sites would be controlled to prevent any off-site increases in flood risk and/or pollution, including consideration of exceedance flow routes.
4.7.21	Essex County Council	With regard to Rainfall Allowance, the LLFA would highlight that in areas of Essex the climate change allowance is 45%. It is requested that the Applicant check with the Environment Agency for appropriate climate change allowances in Essex.	Section 2.3 of 7.9 Flood Risk Assessment [APP-331] states that the allowance applied within the surface water drainage designs is for a 45% uplift. This was agreed as suitable through engagement with the Lead Local Flood Authority and sharing a pre-submission draft of the Flood Risk Assessment with Essex County Council. This is also confirmed in the Drainage Strategy that has been produced and submitted at Deadline 1 (8.2 Drainage Strategy DCO [REP1-072]).
11.22	Colchester City Council		

⁷⁶ Norfolk County Council (2025) *Norfolk Lead Local Authority Developer Guidance*

ID	Stakeholder	Comment	NG response
4.7.23	Essex County Council	It is considered important that the following are captured as part of a detailed Construction Environmental Management Plan (“CEMP”): - Any temporary works (culverts) to ordinary water courses/drainage channels for the purpose to give access to the project location. - The surface water management during the construction of office, storage compounds. - Required mitigation to prevent onsite/offsite flooding. - Measures taken to prevent any pollutants entering surface water or ground water - Appropriate measures to deal with spills and leakages onsite.	7.2 Outline Code of Construction Practice (Revision B) is an outline management plan that would be fully developed based on detailed design information to be provided by the Main Works Contractor(s) and submitted to discharge Requirement 4 of the 3.1 Draft Development Consent Order [APP-056]. Mitigation measures secured in the 7.2 Outline Code of Construction Practice (Revision B) address the points raised by Essex County Council, specifically commitments W02, W03, W04, W05, W07, W08, W09, W13 and W14.
4.7.24 11.28	Essex County Council Colchester City Council	Concerns about placement of pylons located in Flood Zone 3	The Project has been through extensive routeing and siting studies to place pylons such that the optimal balance of environmental and engineering factors can be achieved. Mitigation is secured for the small number of pylons in Flood Zone 3, in the form of compensatory storage (commitment W17 in 7.2 Outline Code of Construction Practice (Revision B)) and this has been agreed with the Environment Agency, as detailed in 5.9.15 Draft Statement of Common Ground - Environment Agency [REP1-038].
4.7.26	Essex County Council	ECC suggests that the Flood Risk Assessment and the Surface Water Management Principles document be listed as ‘CERTIFIED DOCUMENTS’ of the DCO and that the Construction Environmental Management Plan is drafted to control works that	The flood risk and drainage mitigation measures and controls set out in the Flood Risk Assessment and the Drainage Strategy are all secured through the inclusion of a range of commitments within 7.2 Outline Code of Construction Practice (Revision B).

ID	Stakeholder	Comment	NG response
		affect ordinary watercourses/drainage channels, surface water drainage, and the control of pollutants.	
11.20 11.27	Colchester City Council	LLFA requests further clarity on the location of permanent and temporary construction works. It is requested that the Applicant provide a plan identifying the location of permanent and temporary works to aid assessment and ensure appropriate mitigation measures are in place.	6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] shows proposed permanent and temporary features of the Project and 6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134] shows the proposed permanent features of the Project.
11.20	Colchester City Council	All works will require appropriate flood mitigation and surface runoff management, to ensure any excess runoff from drainage systems does not impact third party land	Commitment GG22 in 7.2 Outline Code of Construction Practice (Revision B) secures that the Main Works Contractor(s) will prepare a Surface Water Management Plan. This plan will be substantially in accordance with 8.2 Drainage Strategy DCO [REP1-072] , submitted at Deadline 1, which describes proposed surface runoff controls and the measures that would be in place to avoid impacts on third party land. Table 1.1 of 7.9 Flood Risk Assessment [APP-331] and the 7.2 Outline Code of Construction Practice (Revision B) also provide flood mitigation measures.
11.21	Colchester City Council	In principle, the management of surface runoff from these sites should mitigate any increased risk of flooding. However, based on the submitted information, the LLFA retains certain concerns that have not been addressed from previous discussions and that have been set out in consultation responses to the Applicant, without feedback or discussion from the Applicant. This gives cause for concern for the project.	Further information with reference to surface water management is included in the Drainage Strategy that has been produced and submitted at Deadline 1 (8.2 Drainage Strategy DCO [REP1-072]). The drainage mitigation measures described in this strategy are secured by commitment GG22 in 7.2 Outline Code of Construction Practice (Revision B) . The Applicant welcomes further discussion with Lead Local Flood Authorities on the Drainage Strategy.

ID	Stakeholder	Comment	NG response
11.25	Colchester City Council	Network modelling should be done for 100 years plus climate change allowance. Information contained in the application does not provide sufficient certainty that measures will be in place for the 1 in 30 and 1 in 100 rainfall events	Calculations are included within the Drainage Strategy that has been produced and submitted at Deadline 1 (8.2 Drainage Strategy DCO [REP1-072]). The drainage mitigation measures described in the strategy are secured by commitment GG22 in 7.2 Outline Code of Construction Practice (Revision B) .
11.28	Colchester City Council	In terms of site specific flooding, CCC wanted to take this opportunity to note that at the time of writing this LIR, the river valleys of the CCC area are extremely flooded. For example but not limited to, the split undergrounded section that crosses the River Stour on both sides of the Essex/Suffolk border is an extensive wetland currently. This can be viewed from the Langham Hall Estate. High speed directional drilling would not be possible at the present time due to the extent of the flooding so this will need to be factored in. The same is true south of Fordham where a biodiversity area creating a wetland alongside the natural river flooding has created a significant area of water that sits in within the order limits, however that is an area where OHL is proposed.	It is acknowledged that areas such as these are susceptible to flooding in 7.9 Flood Risk Assessment [APP-331] . Works in these areas would be programmed to avoid periods of flooding. 7.2 Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan [APP-307] sets out flood emergency arrangements during the construction phase.
10.8	Norfolk County Council	In relation to temporary haul roads, NCC has not seen any information in relation to soil stabilisation in the cleared swathe to prevent the silting up (polluting) of the surface water drainage system and local watercourses	Commitment GG24 within 7.2 Outline Code of Construction Practice (Revision B) would ensure that earthwork mounds and stockpiled soil would be protected in line with 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303] (to avoid dust generation) by covering, seeding, or using water suppression where appropriate (to be determined by the soil type and the likely storage duration). Further, the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303] describes

ID	Stakeholder	Comment	NG response
			that a soil scientist would develop an appropriate testing schedule to confirm the suitability of any soil stabilisation approach. These controls, in combination with measures secured by commitments GG22 and B03 would prevent silting up of drainage systems and local watercourses.
10.11	Norfolk County Council	Temporary construction works have the potential to cause serious flooding and pollution incidents. NCC is not content to assume a negligible impact on the basis of 'standard' mitigation measures. Site specific assessment and tailored mitigation proposals are necessary to provide effective mitigation measures.	A number of mitigation measures to control the potential effects of construction works on water environment receptors, the land drainage regime and flood risk are secured in commitments in 7.2 Outline Code of Construction Practice (Revision B) . These include but are not limited to GG08, GG21, GG22, GG32, AS05, GH05, W02, W05, W09, W10, W13 and W14. This is a typical approach to assessing and mitigating the impacts of Development Consent Order projects. Where site-specific and tailored mitigation proposals rely on having detailed design information for the Project, there is a commitment to provide these details and further, to shape such measures in liaison with the Lead Local Flood Authorities, as set out in measure GG22 that states: <i>'The Main Works Contractor(s) will prepare a Surface Water Management Plan to inform discharge of the DCO Requirement. The Surface Water Management Plan will demonstrate how runoff across the site will be controlled to prevent any off-site increases in flood risk and/or pollution, including consideration of exceedance flow routes ... Construction drainage measures will be developed liaising with the Lead Local Flood Authorities (LLFAs), with ongoing dialogue during implementation of the measures.'</i>

ID	Stakeholder	Comment	NG response
			The Final Code of Construction Practice would also need to be discharged as part of Requirement 4 in 3.1 Draft Development Consent Order [APP-056] .
10.12	Norfolk County Council	Access tracks will be retained from construction throughout the operational phase for maintenance and, NCC is not content to agree that operational flood risk impacts will be negligible.	Permanent access tracks serving the Project's operational infrastructure, including external access roads to the proposed substations and Cable Sealing End compounds would be served by drainage features designed to accommodate, treat and attenuate runoff from storm events up to and including the 1% annual chance plus 45% allowance for climate change event. Further details are provided in 8.2 Drainage Strategy DCO [REP1-072] , which was submitted at Deadline 1. The drainage mitigation measures described in the strategy are secured by commitment GG22 in 7.2 Outline Code of Construction Practice (Revision B) . During operation of the Project, access to all other infrastructure would be via existing roads and tracks or rights over land with no physical works. There is therefore no potential for the Project to cause detriment to the land drainage regime along these routes, which are illustrated in 6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134] .
10.14 to 10.16	Norfolk County Council	NCC would need to be a consultee for applications to discharge requirement 4 in relation to the code of construction practice. NCC proposes a new requirement to secure a construction surface water management plan. This approach would require the applicant to produce an outline document before the end of the examination to be included in Schedule 19 as a certified document.	The applicant has submitted 8.2 Drainage Strategy DCO [REP1-072] at Deadline 1 which may be considered an outline plan, that provides information on drainage principles and calculations that support the strategy for the management of construction phase surface water runoff. Relevant stakeholders will be engaged with on the development of the full detailed surface water management plans for the construction

ID	Stakeholder	Comment	NG response
			and operation of the Project to inform discharge of the relevant DCO Requirement.
6.9.3	Thurrock Council	Decommissioning phase - to ensure acceptability from a Local Lead Flood Authority ("LLFA") perspective, robust mitigation is required, including detailed drainage strategies, protection of ordinary watercourses, safeguarding of overland flow paths, groundwater management measures, and site-specific FRAs for areas within Flood Zones 2 and 3, demonstrating no increase in flood risk on or off site over the lifetime of the development. Production of a Surface Water Management Plan for decommissioning	Requirement 13 within 3.1 Draft Development Consent Order [APP-056] states that ' <i>(1) In the event that, at some future date, the authorised development, or part of it, is to be decommissioned, a written scheme of decommissioning must be submitted to the relevant planning authority for its approval in consultation with the relevant highway authority, at least six months prior to decommissioning works. (2) The approved scheme must be implemented as approved as part of the decommissioning of the authorised development or relevant part of it. (3) This requirement does not apply to the part of the authorised development and associated development described in Schedule 1 (authorised development) which relates to the dismantling and removal of existing infrastructure or apparatus. (4) The written scheme of decommissioning submitted under sub paragraph (1) must include environmental assessment undertaken in accordance with the laws and regulations applicable at the time it is submitted to the relevant planning authority.</i>
Table 9 – Decommissioning Phase Impacts	Suffolk County Council		
6.11.19	Thurrock Council	There is also a need for mitigation to prevent flooding, including the following mitigation measures at set out in the LLFA section of this LIR: Crossing the ordinary watercourses	Commitment W02 within 7.2 Outline Code of Construction Practice (Revision B) lists the mitigation measures that would be in place for open cut watercourse crossings and installation of vehicle crossing points. This commitment, in addition to commitments W03, W10, W12, W14, W15, GG17, B02, B03, B04, B11 and B14, address safeguarding the hydraulic function and structural integrity of

ID	Stakeholder	Comment	NG response
			watercourses, flood mitigation at crossings, mitigation for ecology and hydrogeology and maintaining the flow regime. Reference is made to the Statement of Common Ground meeting that was held with Thurrock on 3 February 2026 and the agreed actions (in terms of sharing additional information to address Lead Local Flood Authority queries).
6.9.53	Thurrock Council	Where the site is identified as being susceptible to groundwater emergence, appropriate mitigation measures must be incorporated. The drainage design must demonstrate that groundwater will be safely controlled without causing instability, contamination, or increased flood risk elsewhere	Commitment GH07 within 7.2 Outline Code of Construction Practice (Revision B) addresses dewatering. As per commitments GH01 and GH02, appropriate investigations and assessments would be undertaken where required. A Drainage Strategy has been produced and submitted at Deadline 1 (8.2 Drainage Strategy DCO [REP1-072]). The drainage mitigation measures described in the strategy are secured by commitment GG22 in 7.2 Outline Code of Construction Practice (Revision B). Long-term land drainage provisions are also addressed in commitments W08, W13 and W14. Section 4.11 of 7.9 Flood Risk Assessment [APP-331] covers groundwater flood risk and concludes that construction activities, the operation and decommissioning of the Project are not anticipated to increase risk of flooding from this source.
6.9.54	Thurrock Council	For any part of the development located within Flood Zones 2 or 3, a site-specific FRA must be submitted. The FRA shall demonstrate that the development will be safe for its lifetime, incorporate appropriate flood resilience and resistance measures, provide safe access and egress during flood events, and	7.9 Flood Risk Assessment [APP-331] covers these points.

ID	Stakeholder	Comment	NG response
		include suitable flood warning and emergency planning arrangements	
6.10.15	Thurrock Council	Although Section H (Thurrock) lies within Flood Zone 1 of the Project, Thurrock Council stresses the flood warning and evacuation procedures for Flood Zones 2 and 3 as outlined in the Outline Code of Construction Practice (CoCP) must be followed and implemented for the rest of the proposed development. For instance, prior to construction works commencing and to reduce the risk of flooding within Section H (Thurrock), appropriate site drainage must be put into place and temporary construction haul roads must be resiliently designed such as using suitable geo-textiles.	7.2 Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan [APP-307] sets out flood emergency arrangements during the construction phase and provides information for construction Site Manager(s) and on-site personnel on how to respond to a warning of a fluvial and / or surface water flood event. A Drainage Strategy has been produced and submitted at Deadline 1 (8.2 Drainage Strategy DCO [REP1-072]). This covers management of surface water during construction. The drainage mitigation measures described in the strategy are secured by commitment GG22 in 7.2 Outline Code of Construction Practice (Revision B). With regard to the temporary construction haul roads, commitment W10 within 7.2 Outline Code of Construction Practice (Revision B) states '<i>The design of the haul roads themselves will include some resilience to flooding for example, incorporating suitable geo-textiles to stabilise the road surfacing</i>'.
6.10.16	Thurrock Council	The flood warning and evacuation procedures for surface water flooding outlined the Outline CoCP Flood Warning and Evacuation Plan (FWEP) must be followed. This includes ensuring that worksites at risk of flooding have equipment and hazardous materials are either moved to higher ground or protected or securely covered and ensure on-site personnel are moved to higher ground.	These points are addressed in 7.2 Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan [APP-307] and by commitments W07, W11 and GG21 within 7.2 Outline Code of Construction Practice (Revision B) .

ID	Stakeholder	Comment	NG response
11.38, 11.39 and 11.40	Suffolk County Council	Construction Phase Impacts: Construction activities will result in surface water runoff, habitat loss at temporary ordinary watercourse crossings and location of some works within flood zones risks the safety of the development and has the potential to increase flood risks elsewhere.	Further information regarding proposals to manage surface water runoff during construction of the Project are provided in 8.2 Drainage Strategy DCO [REP1-072] , which was submitted at Deadline 1. The drainage mitigation measures described in the strategy are secured by commitment GG22 in 7.2 Outline Code of Construction Practice (Revision B) . Commitment B02 within 7.2 Outline Code of Construction Practice (Revision B) commits to designing out / minimising as far as practicable construction effects on habitats and the reinstatement of areas used for temporary works. W07 secures measures to reduce the potential for displacement of fluvial floodwaters during construction of the Project to prevent increases in flood risk elsewhere.
11.43, and 11.45	Suffolk County Council	Operational Phase Impacts: Operational activities will result in surface water runoff and location of some works within flood zones risks the safety and resilience of the development and has the potential to increase flood risks elsewhere.	Further information regarding proposals to manage surface water runoff during operation (and maintenance) of the Project are provided in 8.2 Drainage Strategy DCO [REP1-072] . The drainage mitigation measures described in the strategy are secured by commitment GG22 in 7.2 Outline Code of Construction Practice (Revision B) . Where Flood Zones 2 and 3 could not be avoided for operational infrastructure (limited to a small number of pylons which are flood resilient by design), mitigation is secured through commitment W17 in 7.2 Outline Code of Construction Practice (Revision B) , as agreed with the Environment Agency, detailed in 5.9.15 Draft Statement of Common Ground - Environment Agency [REP1-038] , in order to prevent increase in flood risk elsewhere.

ID	Stakeholder	Comment	NG response
11.51	Suffolk County Council	The Councils do not consider good practice measure W07 to be the correct interpretation of relevant policy, where it refers to parts of the development being laid out in accordance with the sequential test. The sequential test applies to the whole development where any built or access / egress element would be affected by flooding from any source, having regard to climate change	The Applicant confirms that the Sequential Test has been applied and wishes to clarify that, where it has not been possible to wholly avoid works in areas at risk of flooding, the intention of commitment W07 in 7.2 Outline Code of Construction Practice (Revision B) is to ensure that construction work sites in these areas are laid out in accordance with the sequential approach, in that, where there is a varying degree of flood risk across a work site, the most vulnerable components are placed in the areas at lowest risk.
11.52	Suffolk County Council	The Councils query whether there is any scope for the Little Wenham cable sealing end compound to be located outside of flood zone 3 plus climate change to mitigate the risk of safety and resilience to this part of the development and reduce the impact of increasing flood risk elsewhere	The Applicant confirms that commitment W19 within 7.2 Outline Code of Construction Practice (Revision B) secures that the proposed Wenham Grove Cable Sealing End compound (previously referred to as Little Wenham) would be positioned within the defined Limits of Deviation in Flood Zone 1, avoiding Flood Zone 3, in order to ensure the safety of this part of the Project and to reduce the impact of increasing flood risk elsewhere.
11.53	Suffolk County Council	The Councils query the statement at 4.10.5 “Due to the nature of the third-party infrastructure works no operational effects on surface water flood risk are anticipated, and further assessment has therefore been screened out” and request further clarity on this matter	The Applicant can confirm that this conclusion, that is stated within 7.9 Flood Risk Assessment [APP-331] is based on the nature of the proposed third-party infrastructure works. These works entail the undergrounding of localised reaches of existing overhead lines. Following completion of the construction activities and reinstatement of the land, there would be no potential for impacts on surface water flow paths, runoff generation or runoff quality.
11.54	Suffolk County Council	The LLFA considers that temporary drainage for construction shall be provided for approval in the	Commitment GG22 within 7.2 Outline Code of Construction Practice (Revision B) secures that the Main Works Contractor(s) would prepare a Surface

ID	Stakeholder	Comment	NG response
		form of a construction surface water management plan (“CSWMP”).	Water Management Plan to inform discharge of Requirement 4 of 3.1 Draft Development Consent Order [APP-056] , stating that construction drainage measures will be developed liaising with the Lead Local Flood Authorities, with ongoing dialogue during implementation of the plan.
11.56	Suffolk County Council	Any surface water drainage must be in accordance with National standards for Sustainable Drainage Systems (“SuDS”) and the SCC SuDS guidance.	The Applicant submitted 8.2 Drainage Strategy DCO [REP1-072] at Deadline 1. The strategy was prepared in accordance with the requirements of the National Standards for SuDS ⁷⁷ and the Suffolk County Council SuDS guidance ⁷⁸ . The drainage mitigation measures described in the strategy are secured by commitment GG22 in 7.2 Outline Code of Construction Practice (Revision B) .
16.5	Tendring District Council	Much of north-west Tendring comprises intensively farmed, clay-dominated soils that depend on shallow field drains, ditches and historic land drainage systems. These systems are already at capacity during wet periods. Any interruption, compaction, or overloading threatens direct agricultural harm and downstream flooding.	The Applicant is committed to ensuring the integrity and function of existing land drainage systems. 8.2 Drainage Strategy DCO [REP1-072] , submitted at Deadline 1, provides further details and controls are secured via measures AS05 and GG22 within 7.2 Outline Code of Construction Practice (Revision B) .
16.6	Tendring District Council	Many homes in Little Bromley and surrounding hamlets rely on private wells and groundwater-fed systems. TDC notes that the ES provides limited clarity on the protection of such supplies, beyond a general statement that contamination risk is “negligible”. Given the scale of earthworks, dewatering, and potential for polluted runoff from	Commitment W04 within 7.2 Outline Code of Construction Practice (Revision B) secures that active private water supplies would be identified through landowner discussions and baseline monitoring would be undertaken. Appropriate measures would be considered during construction to protect these private water supplies. Contingency

⁷⁷ Department for Environment, Food and Rural Affairs (2025) *National standards for sustainable drainage systems (SuDS)*

⁷⁸ Suffolk County Council (2023) *Suffolk County Council Local SuDS Guidance*

ID	Stakeholder	Comment	NG response
		compounds and haul roads, TDC does not consider this risk adequately assessed	mitigation measures are also provided for, with the commitment to provide an alternative water supply should the Project installation works be shown to affect a private water supply. This is in line with standard practice for Development Consent Order projects.
16.19	Tendring District Council	The combined area of new hard surfacing is unprecedented for a rural district of this character. The ES does not assess cumulative hydrological effects for Tendring in a meaningful way, despite TDC raising this repeatedly during consultation and in the SoCG	More information has been provided by the Applicant in 8.2 Drainage Strategy DCO [REP1-072] , published at Deadline 1. This strategy describes how rainfall runoff from all impermeable elements of the Project, during its construction and operation, would be captured, controlled, treated and attenuated, prior to infiltration or release to a surface watercourse. Calculations are provided that support the sizing of drainage features and the strategy has been developed in accordance with the National Standards for Sustainable Drainage Systems ⁷⁹ and relevant local guidance from the Lead Local Flood Authorities. The drainage mitigation measures described in the strategy are secured by commitment GG22 in 7.2 Outline Code of Construction Practice (Revision B) .

⁷⁹ Department for Environment, Food and Rural Affairs (2025) *National standards for sustainable drainage systems (SuDS)*

4.11 Landscape and Visual

Introduction

- 4.11.1 The Landscape and Visual Impact Assessment (LVIA) (**6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**) follows the approach outlined in **6.19 Scoping Report [APP-288 – APP-296]** and takes into consideration **6.20 Scoping Opinion [APP-297]**. It follows a robust and consistent methodology, with clear, transparent criteria and assessment grades as set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]**, in line with professional guidance in the Guidelines for Landscape and Visual Impact Assessment⁸⁰ and Clarification Notes⁸¹.
- 4.11.2 The LVIA approach and methodology were presented to and discussed with statutory consultees between July 2022 and April 2025 as outlined in Table 13.1 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. The LVIA judgements were informed by detailed desk and field studies undertaken along the entire Project, in all seasons between 2022 and 2025. The findings are supported by detailed explanations within **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]** together with detailed explanations and visualisations in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment – Parts 1 to 4 of 4 [APP-229 to APP-232]**. The assessment team has thoroughly explored potential effects on landscape and visual receptors out to at least 3 km from the Project, and their findings and judgements are set out, in an objective and consistent manner. Following the implementation of embedded and standard mitigation, **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** identifies significant adverse residual effects on visual receptors in close to medium views of construction works during construction. During operation (and maintenance) there would be significant adverse residual effects on visual receptors up to approximately 2 km from the above ground 400 kV overhead line element of the Project.
- 4.11.3 Effects on residential visual amenity are considered in **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 to APP-234]** (RVAA) which concluded that the Project would not breach the residential visual amenity threshold at any property.
- 4.11.4 Effects on nationally designated landscapes are considered in **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]**, which presents the assessment of effects of the Project on the special qualities of Dedham Vale National Landscape. Section 13.5 of **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** sets out the method of approach for assessing effects of the Project on Dedham Vale National Landscape. The assessment was undertaken with reference to NatureScot's Special Landscape Qualities Guidance⁸² on assessing effects, the principles of which can be applied to developments outside of Scotland. The Project

⁸⁰ Landscape Institute and Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment, 3rd Edition

⁸¹ TGN-2024-01 Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3)

⁸² NatureScot (2025) Special Landscape Qualities - Guidance on assessing effects

would result in significant adverse effects on some of the special qualities of the Dedham Vale National Landscape during construction. During operation (and maintenance) the adverse effects on the special qualities of the National Landscape are judged to be not significant

- 4.11.5 As identified within the submitted Local Impact Reports, the key areas of concern or disagreement relating to landscape and visual matters include the following:
- Concerns about the approach to judgements of landscape value, for example in terms of aspects considered, values assigned to individual criteria and overall judgements made
 - Differences in opinion related to the approach to judgements of the value of views
 - Concerns raised related to the number of landscape and visual viewpoints and in some instances relating to gaps between viewpoints, locations of specific viewpoints and requests for more visualisations
 - Differences in opinion relating to the spread of significant landscape and visual effects perpendicular from the proposed 400kV overhead line
 - Concerns about the perceived ‘industrialisation’ of rural landscapes
 - Concerns raised about the landscape and visual effects relating to specific areas along the Project including effects on Dedham Vale National Landscape
 - Concerns about landscape and visual mitigation
 - Concerns about vegetation loss and replacement proposals
 - Concerns about cumulative landscape and visual effects
 - Concerns raised about residential visual amenity including consideration of the limits of deviation.
- 4.11.6 These matters have been responded to through the SoCG process and we will continue to engage with the host authorities to reach further areas of agreement where possible.

Local Authority Positions

- 4.11.7 All Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 4.19 Landscape and Visual - Local Impact Report coverage

Local Authority	LIR sections covering this topic
Norfolk County Council	Section 11 (see the table below for detailed responses to paragraphs 11.12, 11.15, 11.22)
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	Section 13, Annex B and Annex C (see the table below for detailed responses to paragraphs 13.166, 13.186, 13.187, 3.16, 13.93, 13.99, 13.100, 13.105, 13.108, 13.114, 13.115, 13.118, 13.148, 13.150-13.154, 13.189, 13.190, 13.194-13.197,

Local Authority	LIR sections covering this topic
	Annex B, 1.10, Annex C: 1.1, 1.3, 1.4 – 1.10, 1.12, 1.14 – 1.17, 1.19, 1.20, 1.22, 1.24, 1.29, 1.30 - 1.32, 1.35, 1.38, 1.40, 1.41, 1.45, 1.47, 1.50, 1.51, 1.54, 1.56, 1.58, 1.61, 1.66, 1.71, 1.73, 1.74, 1.76, 1.80, 1.83, 1.87, 1.88, 1.90, 1.91, 1.93, 1.96, 1.97, 1.100)
Essex County Council	Section 4.10 (see the table below for detailed responses to paragraphs 4.10.18 – 4.10.20, 4.10.23, 4.10.25-4.10.27)
Thurrock Council	Section 6.2 (see the table below for detailed responses to paragraphs 6.2.15, 6.2.19)
South Norfolk District Council	Paragraphs 3.1.3 – 3.1.9, Sections 8.2, 10.6 and 12 (see the table below for detailed responses to paragraphs 3.1.3, 3.1.8, 8.2.5, 8.2.6, 10.6.2, 11.2.1, 12.3.1)
Tendring District Council	Sections 2, 12 and 20 (see the table below for detailed responses to paragraphs 2.12, 12.6, 12.16, 20.4 – 20.6, 20.11)
Colchester City Council	Section 12 (see the table below for detailed responses to paragraphs 12.43 – 12.44, 12.46 - 12.47, 12.50, 12.57, 12.71 – 12.76, 12.200, 12.216 - 12.218, 12.228, 12.239, 12.249, 12.78, 12.80, 12.81, 12.83, 12.85, 12.87 - 12.89, 12.91, 12.94, 12.109, 12.111, 12.114, 12.133, 12.134, 12.149, 12.153, 12.156, 12.161 – 12.164, 12.167, 12.172, 12.173, 12.178, 12.180 – 12.182, 12.186, 12.188-12.191, 12.199, 12.203, 12.206 -12.209, 12.213, 12.225, 12.227, 12.230, 12.232, 12.234, 12.237, 12.242 - 12.244)
Braintree District Council	Section 7 (see the table below for detailed responses to paragraphs 7.5.1, 7.5.3, 7.8.2, 7.10.4, 7.10.5, 7.12.2)
Chelmsford City Council	Section 8 and Section 11 (see the table below for detailed responses to paragraphs 8.53, 8.154, 8.158, 8.312, 8.333 – 8.334, 8.337, 8.355 - 8.369, 8.375 – 8.378, 8.385 - 8.392, 8.395 -8.397, 8.401 – 8.402, 8.405 – 8.408, 8.410 – 8.416, 8.418 – 8.425, 8.432 – 8.435, 8.437 – 8.438 11.12, 11.38,)
Brentwood Borough Council	Paragraphs 6.56 – 6.65 (see the table below for detailed responses to paragraphs 6.59 - 6.61)

- 4.11.8 Please also refer to Waveney Valley, Great and Little Waltham, EACN Siting, Landscape Compensation, Replacement Tree Planting and Furthering the Purposes of the National Landscape in Chapter 3 for related matters.
- 4.11.9 The Applicant has engaged extensively with Local Authorities on Landscape and Visual matters. This is reported in detail in Statements of Common Ground (SoCGs) (see Table 1.1 for Examination Library references). Within the SoCGs, matters are categorised as Agreed, Not Agreed or Under Discussion.
- 4.11.10 Each SoCG includes a table listing each environmental topic chapter in the Environmental Statement. Under each environmental topic chapter subheading, are a list of seven categories which are aligned with how the Environmental Impact Assessment was undertaken.
- 4.11.11 The bullet points below (split by category) provide a summary of where agreements are currently up to with the host Local Authorities relating to Landscape and Visual (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG).
- Matters relating to EIA – Regulatory, Planning Policy Context and Guidance are under discussion with 8/12 Local Authorities
 - Matters relating to EIA – Approach and Methods are under discussion with 8/12 Local Authorities
 - Matters relating to EIA – Baseline Conditions are under discussion with 9/12 Local Authorities
 - Matters relating to EIA – Embedded, Standard and Additional Mitigation Measures are under discussion with 8/12 Local Authorities
 - Matters relating to EIA – Assessment Conclusions are under discussion with 10/12 Local Authorities
- 4.11.12 Matters relating to Draft DCO / Outline Management Plans / Mitigation and Monitoring are under discussion with 11/12 Local Authorities
- 4.11.13 The following key points remain not agreed, and will be subject to ongoing engagement:
- Baseline Condition (Suffolk County Council – Not Agreed)
 - Embedded, Standard and Additional Mitigation Measures (Suffolk County Council and Braintree District Council – Not Agreed)
- 4.11.14 With the exception of Thurrock County Council who agree all matters there are a number of matters that are still under discussion with Norfolk County Council, Suffolk County Council, Essex County Council, South Norfolk Council, Babergh and Mid Suffolk Councils, Tendring District Council, Colchester City Council, Braintree District Council, Chelmsford City Council, Brentwood Borough Council and Basildon Borough Council as illustrated in the table below.

4.11.15 The table below reflects the category (agreed, under discussion, not agreed), most frequently recorded across the SoCGs for each of the 13 Local Authorities relating to Landscape and Visual (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG).

Image 4.7 Landscape and Visual - Categorisation of Matters in Statements of Common Ground

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Condition	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring	Other matters as required
Norfolk County Council	Agreed	Agreed	Under discussion	Agreed	Agreed	Under discussion	-
Suffolk County Council	Under discussion	Under discussion	Not agreed	Not agreed	Under discussion	Under discussion	Under discussion
Essex County Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	-
Thurrock County Council	Agreed	Agreed	Agreed	Agreed	Agreed	Agreed	-
South Norfolk Council	Agreed	Agreed	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion
Babergh and Mid Suffolk Councils	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	-
Tendring District Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion
Colchester City Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	-

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Condition	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring	Other matters as required
Braintree District Council	Agreed	Agreed	Agreed	Not agreed	Under discussion	Under discussion	Under discussion
Chelmsford City Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion
Brentwood Borough Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	-
Basildon Borough Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	-

Responses to New Matters and Applicant Clarifications

- 4.11.16 The table below sets out the Applicant's response to the matters raised in the Local Impact Reports that the Applicant previously has not addressed in their documents, including Statements of Common Ground with Local Authorities or in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**.

Table 4.20 Landscape and Visual – Responses to New Matters and Applicant Clarifications

ID	Stakeholder	Comment	NG response
11.12	Norfolk County Council	Within Norfolk the Norwich to Tilbury project comprises of a new 400kV overhead line extending south from Norwich Main Station, crossing agricultural plateau and tributary valley landscapes, together with cable sealing end compounds ("CSE"), temporary construction compounds and associated access tracks. Eighty-eight 50m pylons will be located in Norfolk, stretching from Norwich Main Substation to the Waveney Valley at the border of Norfolk and Suffolk. The ES concludes that there will be widespread significant adverse landscape effects, including in all landscape character areas directly affected by the cable route.	The Applicant agrees that there will be significant effects on landscape character within approximately 1.5 km of the Project, as set out in paragraphs 13.3.5 to 13.3.170 within 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. The Applicant notes that there are no Cable Sealing End (CSE) compounds within Norfolk County Council. The landscape and visual impact assessment (LVIA) set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] does not conclude there will be widespread significant adverse landscape effects. Given the overall length of the Project and the fact there will be effects along its length, the Applicant can appreciate the Local Planning Authority may deem effects to be widespread in that sense. However, given the linear nature of the project, the way effects will be experienced in practice will be through change experienced more locally. The Project will traverse a large area but its influence, perpendicular to the proposed 400 kV overhead lines, will be relatively limited. This is owing to the fact that steel lattice pylons are designed to be visually permeable and not to be widely visible, as would be the case for example for a tall building such as a power station which would have a solid appearance.

ID	Stakeholder	Comment	NG response
11.15	Norfolk County Council	NCC broadly agrees with the LVIA baseline descriptions provided in the ES, however some of the tranquillity of the Waveney Valley is understated in the ES narrative. Although the Waveney Valley valued landscape assessment ("VLA") is cited as a data source and in the bibliography of this chapter of the ES, there is little evidence of engagement with the substance of the VLA. NCC consider that it would be helpful for the ES to present conclusions on the Waveney Valley in a similar manner to designated landscapes.	The Waveney Valley is underlain by three Landscape Character Types (LCTs) / Landscape Character Areas (LCAs). The following effects are identified during construction and operation, as set out in paragraphs 13.3.155 to 13.3.212 in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. • Waveney Rural River Valley LCA (high sensitivity) - the assessment notes that there would be adverse effects on the '<i>peaceful and tranquil character</i>' which is identified as a key characteristic of the LCA (paragraph 13.3.167). Effects are identified as major and significant (adverse) within 0.5 km, moderate and significant (adverse) between 0.5 km and 1.5 km, and minor and not significant (adverse) elsewhere in the LCA. • Wooded Valley Meadowlands and Fens LCT (high sensitivity) - the assessment notes that the Project would be introduced into a landscape noted for its '<i>sense of quiet and rural isolation</i>' which is identified as a key characteristic of the LCT (paragraph 13.3.208). Effects are identified as moderate and significant (adverse) within 0.5 km, minor and not significant (adverse) between 0.5 km and 1.5 km, and negligible and not significant elsewhere in the LCT. • Rolling Valley Farmlands and Furze LCT (medium sensitivity) - the assessment notes that the Project would result in '<i>effects on the tranquil setting of Wortham Ling and the adjacent Waveney Valley</i>' (paragraph 13.3.194). Effects are identified as moderate-major and significant (adverse) within 0.5 km during construction, reducing to moderate and significant (adverse) during operation. Effects are

ID	Stakeholder	Comment	NG response
			identified as moderate and significant (adverse) between 0.5 km and 1 km and minor and not significant (adverse) elsewhere in the LCT, during both construction and operation. The assessment of effects on landscape character is dealt with consistently throughout the Study Area in accordance with the methodology set out in paragraphs 13.4.14 to 13.4.43 in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]. The assessment has been reviewed in light of the comments made, and it is considered that the judgements made remain fair and reasonable and are not considered to understate the tranquillity of the Waveney Valley. Judgements on landscape value were made as part of the assessment in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. Landscape value judgements are detailed in Annex A Landscape Value Assessment, which is presented in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. These value judgements were informed by the Landscape Institute's Technical Guidance Note 02/21: Assessing Landscape Value Outside National Designations. This defines landscape value as '<i>the relative value or importance attached to different landscapes by society on account of their landscape qualities</i>' (page 3). The value judgements were informed by a range of sources including the Waveney Valley Valued Landscape Assessment. The approach to the assessment of effects on designated landscapes follows professional guidance and is set out in Section 13.5 of 6.13.A1

ID	Stakeholder	Comment	NG response
11.22	Norfolk County Council	<i>Tas Valley Crossing</i> In considering the loss of woodland under different scenarios, it is important to consider the value of woodlands for landscape and visual purposes as well as for biodiversity.	Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]. As the Waveney Valley is not a nationally designated landscape, using this approach would be inconsistent. The approach to making judgements on the value of landscape receptors is set out in paragraph 13.4.25 to Table A13.1.4 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]. Value judgements were informed by the Landscape Institute's Technical Guidance Note (TGN) 02/21 Assessing Landscape Value Outside National Designations. This defines landscape value as <i>'the relative value or importance attached to different landscapes by society on account of their landscape qualities'</i> (page 3). Consideration of woodland falls under a range of factors (or criteria) including Natural Heritage, Landscape condition, Distinctiveness, Perceptual (scenic) and Functional factors. As highlighted within the assessment for LCA B1: Tas Tributary Farmland in paragraph 13.3.111 to Table A13.2.11 in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228], woodland within the landscape is a key characteristic of the LCA, with <i>'small blocks of deciduous woodland... [which] create wooded horizons which add variety to and create intimacy within the landscape'</i>. With regards to the perceptual qualities of the landscape, the assessment takes these into account and notes that <i>'there is a greater degree of intimacy around tributary rivers where the Project could be seen to contrast with smaller-scale fields and small blocks of woodland'</i>. Woodland within the LCA also contributes to a more enclosed visual quality within the

ID	Stakeholder	Comment	NG response
			landscape, generally limiting effects to within 1.5 km of the Order Limits and reducing intervisibility to the wider LCA.
13.166	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	The Councils welcome Table 7.1 Mitigation hierarchy for veteran trees, but queries whether the measures described will be agreed with the relevant local authority.	The final Landscape and Ecological Management Plan will be agreed with the relevant LPAs. 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323] states '<i>The final mitigation measures, remediation works and long-term monitoring are to be agreed at detailed design stage with the Project arboriculturist and the relevant landowners on a case-by-case basis.</i>'
13.186	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	The Councils consider that the remediation works, specified in Section 5.7 should also be agreed with the relevant local authority.	The final Landscape and Ecological Management Plan will be agreed with the relevant LPAs. 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323] states '<i>The final mitigation measures, remediation works and long-term monitoring are to be agreed at detailed design stage with the Project arboriculturist and the relevant landowners on a case-by-case basis.</i>'
13.187	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	The Councils welcome the proposed monitoring measures set out in section 5.8, including the development of a monitoring programme. SCC considers this should be agreed with the relevant local authority or ecological working group.	The final Landscape and Ecological Management Plan will be agreed with the relevant LPAs. 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323] makes reference to a 30 year monitoring period. '<i>The final mitigation measures, remediation works and long-term monitoring are to be agreed at detailed design stage with the Project arboriculturist and the relevant landowners on a case-by-case basis.</i>'

ID	Stakeholder	Comment	NG response
13.16	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	The Councils have concerns about the proposed Limits of Deviation (“LoD”) as described in section 13.9 of ES Chapter 13 – Landscape and Visual [APP-226]. The lateral and longitudinal LoD for pylons and overhead lines could, in combination and on their own, significantly alter the resulting landscape and visual effects for the worse. The Councils disagree with the Applicant, that the movement of pylons within a localised area would not be able to make the effects worse, simply because both locations would be in a category of major adverse effects. The Councils consider that at this point a finer assessment grain is required.	The ES assesses the effects of the Project as shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] and 6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134]. Flexibility within the LoD has been considered for landscape and visual effects in Section 13.9 Sensitivity Testing of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. This concluded that overall, there would be no change to the significance of effects on landscape character or visual receptors, set out in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] and 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232], as a result of changes to the Project within LoDs. At Viewpoints 4.37 and 8.12 the level of effect could increase as a result of changes to the LoD, however there would be no change to the significance of effect (Table 13.8 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]). This included consideration of lateral and longitudinal movement of pylons. Flexibility within the LoD has also been considered in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]. Worst-case scenarios, whereby a proposed pylon and/or overhead line could be re-positioned to a location within the LoD where they would have the greatest visual impact upon a property (which predominantly, but not always, would be the closest point to it), were assessed. It should be noted, however, that it would be the outer limits of the conductors’ swing that may possibly be re-located to

ID	Stakeholder	Comment	NG response
			the edge of the LoD, and subsequently, not the pylons themselves.
13.93	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	There are further concerns that the detailed assessments identified in Annex A to Appendix 13.2: Landscape Baseline and Assessment [APP-228] appear to undervalue factors, particularly in relation to ‘Distinctiveness’, ‘Perceptual’ and ‘Functional’ criteria. For instance, for the Ancient Plateau Claylands, the Councils query the identification of the cultural value, distinctiveness and perceptual character of the landscape as low-medium as this appears to ignore the historic landscape character detailed in the Suffolk Landscape Character Assessment, including: ix. The Field pattern of ancient enclosure. x. Dispersed settlement pattern of medieval origin with medieval greens or tyes xi. The two largest surviving greens in Suffolk – Mellis Green (218 acres or 88ha) and Wortham Long Green (102 acres or 41ha)	The approach to making judgements on the value of landscape receptors is set out in paragraphs 13.4.25 to Table A13.1.4 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]. Value judgements were informed by the Landscape Institute’s Technical Guidance Note (TGN) 02/21 Assessing Landscape Value Outside National Designations. This defines landscape value as <i>‘the relative value or importance attached to different landscapes by society on account of their landscape qualities’</i> (page 3). Criteria for assessing landscape value are set out in Table A13.1.4 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]. The following criteria (or factors) are considered when making judgements of landscape value: • Natural heritage • Cultural heritage • Landscape condition • Associations • Distinctiveness • Recreational • Perceptual (scenic) • Perceptual (tranquillity) • Functional value. Judgements on landscape value are clearly presented in Tables A1 to A55 within Annex A Landscape Value Assessment of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and

ID	Stakeholder	Comment	NG response
			Assessment [APP-228]. The Applicant is confident the assessment of landscape value is based on a robust and consistent approach, with clear transparent criteria and assessment grades, in line with the Landscape Institute's TGN 02/21 Assessing Landscape Value Outside National Designations.
13.99	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	Figure 13.10 - Landscape and Visual - ZTV of Bramford Substation extension [APP-246] shows that theoretical visibility of the whole structure of the substation is extensive and goes way beyond the 3 Km study area in several places, especially to the west/south-west/north-west.	As noted in Table A13.1.1 LVIA Study Area of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227], the Study Area for the substation extension at Bramford was 3 km from the LoD. This was considered to be more than adequate as any new infrastructure is expected to be a maximum height of 15 m. Although the Zone of Theoretical Visibility (ZTV) extends beyond 3 km, this does not take into account the reduction in perception of the infrastructure with increasing distance, or given screening from other built features in the landscape, or filtering by vegetation. As set out in paragraph 13.6.6 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227], the ZTV accounts for woodland blocks but does not consider the additional screening and filtering by hedgerows and field trees, small copses or more recently planted trees, woodland and hedgerows which are found in many places throughout the Study Area.
13.100	Suffolk County Council and Babergh District Council and Mid Suffolk	The ZTV of the Wenham Grove CSE Compound (Figure 13.11 - Landscape and Visual -ZTV of Wenham Grove CSE Compound [APP-247]) is largely contained within the 3 KM study area. However, the top half of the structure is theoretically visible within the Dedham Vale National Landscape.	The Applicant confirms that 6.13.F11 Environmental Statement Figure 13.11 - ZTV of Wenham Grove CSE Compound [APP-247] shows theoretical visibility of the top of the proposed CSE compound from a small and localised area of Dedham Vale National Landscape, in a field to the north-east of Lower Raydon. This is at a distance of between 2 – 3 km from

ID	Stakeholder	Comment	NG response
	District Council		the CSE compound. As considered in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] , at these distances the gantries would be difficult to perceive. At worst, effects would be negligible and not significant and as mitigation matures there would be no visual effect relating to the CSE compound from the National Landscape. It is important to remember that the fact that a feature is potentially visible does not automatically equate to the visual effects being significant. The nature and extent of that visibility is also a consideration, as is the sensitivity of the receptor.
13.105	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	The value of the views has been judged largely on identified viewpoints and promoted views in tourist-focussed documents. However, the Councils consider that the ES should demonstrate how the assessment has considered sensitive viewpoints identified in Neighbourhood Plans, and that the value of views should be judged by how they relate to the LCA. The value of view indicators as presented in the assessment downplay the subtle character of East Anglian landscapes and appear concentrated on topography, woodland and water. This approach pre-determines visual value based on certain characteristics and not others.	As set out in Table A13.1.9 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227] , recognition of the value of views was determined with reference to a number of factors, including whether it was recorded as being of importance in a Neighbourhood Plan. This was carried through to the judgement of sensitivity in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232] . In addition to this, the viewpoint assessment in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232] identifies where an LVIA viewpoint is within the vicinity of a key view identified in a Neighbourhood Plan.
13.108	Suffolk County Council and Babergh District Council	SCC considers the base map used for the viewpoint map to be at an unsuitable scale. It would have been helpful if Figure 13.7 - Landscape and Visual - Visual Receptors and Viewpoints, (Doc Ref 6.13.F7, [APP-243]) had used the same base map as Figure	The request for 1:10,000 scale mapping for 6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [APP-243] was noted, however it was considered that the resulting number of sheets required (estimated at over 300) would have

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	Council and Mid Suffolk District Council	4.1 – Project Description - Proposed Project Design (Doc Ref: 6.4.F1, A [APP-133]) and indicated the viewing direction with a cone.	reduced legibility of the figure. Each LVIA visualisation in 7.12 Visualisations [APP-343 to APP-351] is accompanied by a location map on 1:25,000 OS mapping with the field of view also indicated on the figure. The viewpoint assessment in Annex A of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232] is accompanied by 1:25,000 OS mapping and aerial imagery.
13.114	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	The Councils consider that sequential effects and night-time working have not been sufficiently addressed in the viewpoint analysis.	Sequential assessments have been undertaken for long distance paths such as the Angles Way as advocated in the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3) paragraph 6.22. This assessment is set out in Section 13.12 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Although it is recognised that people at the viewpoints used to inform the LVIA move freely around (for example along a road or Public Right of Way), GLVIA3 does not require a sequential assessment for every receptor that could experience a view whilst moving – which would be disproportionate. In considering the nature of the receptor and the likely effect on the view, the way that receptors experience views, perhaps as part of a walk, is considered in making the judgement. The viewpoint assessment in Annex A of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232] notes that construction activity may include lighting in the hours of darkness where it was judged that lighting would be perceptible. This was taken into consideration in the judgement of the effect, during construction.

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13.115	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	For viewpoints and visual receptors in particularly sensitive locations and/or in close proximity to the route, the potential changes within the proposed Limits of Deviation could result in significant changes in visual effects. These potential changes in effects should have been discussed or at least highlighted.	See the response to ID 13.16 (Suffolk County Council and Babergh District Council and Mid Suffolk District Council).
13.118	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	The Councils consider that changes within the Limits of Deviation could potentially lead to very different outcomes for individual visual receptors, vegetation losses and local landscape character. Especially in the areas where the effect would remain major and significant (adverse), the effect could be made worse within this category. To give two examples, at Blood Hill, south of Offton, between The Clamps and Bleak Hall, (RG197 – RG200) the proposed LoD could result in worse visual effects for Bleak Hall and additional vegetation loss at The Clamps. If use was made of the longitudinal LoD at JC12 south of Burstall Lane, the effects could be worse for adjacent residential receptors.	See the response to ID 13.16 (Suffolk County Council and Babergh District Council and Mid Suffolk District Council). The residential visual amenity assessment (RVAA) is set out in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] . Worst-case scenarios, whereby a proposed pylon and/or overhead line could be re-positioned to a location within the LoD where they would have the greatest visual impact upon that property (which predominantly, but not always, would be the closest point to the property) have been considered in the RVAA. With regards to Clamp Farm (The Clamps), as assessed on page 48 in Table A13.4.3, the magnitude of effect would rise from medium to medium-high if a worst-case scenario is assumed. At Bleak Hall, as assessed on pages 48 to 50 in Table A13.4.3, worst case scenario changes within the LoD are not considered to change the level of magnitude (which is already assessed as medium-high). This is due to partial screening from outbuildings, and the number of windows from which the Project would be visible.

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13.148	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	Even where the effects are deemed not significant, the character of the landscape is changed over a much wider area, with proposed overhead lines reducing the provision of what GLVIA3 (Page 18. Para 2.11) describes as: i. Opportunities for aesthetic enjoyment ii. A sense of place and a sense of history which contributes to individual, local, national and European identity. iii. Inspiration for learning, as well as for art and other forms of creativity	GLVIA3, Page 18, Paragraph 2.11 list the reasons for which landscape, as a receptor, may be 'important'. The importance of landscape is considered in the assessment as part of consideration of value. The purpose of LVIA (and EIA) is to identify significant effects. It is recognised that there will be effects resulting from the change including to the factors listed. However, the assessment necessarily focuses upon determining and reporting upon locations and receptors where those effects are expected to be significant.
13.150 to 13.154	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	Decommissioning effects have not been assessed in ES Chapter 13 Landscape and Visual [APP-226] Positive Once completed, it would be expected that, over time, as mitigative planting re-establishes, the removal of the overhead infrastructure would result in beneficial effects for the landscape character of the affected LCTs and LCAs, as well as for visual receptors and the special qualities of the Dedham Vale National Landscape. Neutral None identified. Negative The Councils expect that during decommissioning the adverse effects could be comparable with those during construction.	As noted in Section 4.11 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130], there are currently no specific plans to decommission the Project. It is expected that the need for transmission of electricity would continue for as long as there is a business case for doing so and that any decommissioning activity would occur decades into the future. Requirement 13 within 3.1 Draft Development Consent Order [APP-056] states that '(1) <i>In the event that, at some future date, the authorised development, or part of it, is to be decommissioned, a written scheme of decommissioning must be submitted to the relevant planning authority for its approval in consultation with the relevant highway authority, at least six months prior to decommissioning works. (2) The approved scheme must be implemented as approved as part of the decommissioning of the authorised development or relevant part of it. (3) This requirement does not apply to the part of the authorised development and associated development described in Schedule 1</i>

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		If cables are left in situ, it may still not be possible to reinstate trees in those areas, which would leave the vegetation pattern within the corridor permanently altered.	<i>(authorised development) which relates to the dismantling and removal of existing infrastructure or apparatus. (4) The written scheme of decommissioning submitted under sub paragraph (1) must include environmental assessment undertaken in accordance with the laws and regulations applicable at the time it is submitted to the relevant planning authority.'</i>
13.189	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	The Councils consider the proposed plant sizes are broadly acceptable but suggests reserving light standards for key locations, where the plants can be closely monitored and a heightened maintenance regime is realistic (for example watering). The Councils do not recommend anything bigger than a light standard for any location.	The landscape design is indicative at this stage and will be developed further at detailed design stage. The Applicant has produced the indicative design taking on board previous rounds of comments made by the Local Planning Authorities during and following thematic meetings. This additional point is noted. Replacement planting is typically more successful, and results in a more naturalistic appearance, if 'transplant' and 'feathered' planting stock is used, which is typically 2-3 years old. Older stock is typically reserved for key locations, as suggested. The detail of construction stage planting plans (species, locations, sizes and specification) for the Environmental Areas is to be provided in the final LEMP in accordance with Requirement 4 of 3.1 Draft Development Consent Order [APP-056]. The final LEMP will be approved by the Local Planning Authorities. Details of on-site tree planting elsewhere will be provided in accordance with the Reinstatement Planting Plan secured under Requirement 9 of 3.1 Draft Development Consent Order [APP-056].
13.190	Suffolk County Council and Babergh District Council	With regards to the species selection, these seem broadly acceptable, except that some of the chosen species in the woodland mix are woodland edge rather than woodland species, for example Prunus	The landscape design is indicative at this stage and will be developed further at detailed design stage. The Applicant has produced the indicative design taking on board previous rounds of comments made by the Local

ID	Stakeholder	Comment	NG response
	District Council and Mid Suffolk District Council	avium. The percentages may also require slight adjustments, and the same mixes for the types of planting may not be suitable across the whole length of the project. SCC would be happy to engage further with the Applicant in this matter in due course.	Planning Authorities during and following thematic meetings. This additional point is noted and the offer of engagement with the LPA welcomed. All planting will use native species, appropriate to the location, with woodland edge species being used at the edges, as suggested. The detail of construction stage planting plans (species, locations, sizes and specification) for the Environmental Areas is to be provided in the final LEMP in accordance with Requirement 4 of 3.1 Draft Development Consent Order [APP-056]. The final LEMP will be approved by the Local Planning Authorities. Details of on-site tree planting elsewhere will be provided in accordance with the Reinstatement Planting Plan secured under Requirement 9 of 3.1 Draft Development Consent Order [APP-056].
13.194 to 13.197	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	The Councils query why the proposed woodland planting along the western side of the compound is not continuous and wider, given that the DCO boundaries are further to the west. The gradient for the elevated landform to the south-east of the compound needs to be further reviewed. The Landscape proposals state that this will be no higher than three meters; the oLEMP [AS-046] states that the maximum gradient will be 1 in 3. SCC is concerned that steep slopes such as this would not allow for naturalised edges. With regards to the access road, the Councils query why the hedge is not continued along the western side of the track, from where it enters the Environmental area in the south to join up with the proposed native woodland.	The landscape design for the Environmental Area at Wenham Grove CSE compound is indicative at this stage and will be developed further at detailed design stage. The Applicant has produced the indicative design taking on board previous rounds of comments made by the Local Planning Authorities during and following thematic meetings. These further detailed points are welcomed and will be addressed in drafting construction stage planting plans to fulfil the DCO Requirements. The detail of construction stage planting plans (species, locations, sizes and specification) for the Environmental Area is to be provided in the final LEMP in accordance with Requirement 4 of 3.1 Draft Development Consent Order [APP-056]. The final LEMP will be approved by the Local Planning Authorities. Details of on-site tree planting elsewhere will be provided in accordance with the Reinstatement

ID	Stakeholder	Comment	NG response
		The Councils also query the strip of land between the Environmental Area and the access track towards the south-east and why no measures are proposed here. This could be an opportunity for additional tree belt planting.	Planting Plan secured under Requirement 9 of 3.1 Draft Development Consent Order [APP-056] .
Annex B, 1.10	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	The Councils recognise that there are inherent problems when seeking to mitigate the visual impacts of the scheme receptors in and around the Waverley west of Diss. Whilst additional planting may ameliorate to some extent some of the visual impact, such planting would in many, but perhaps not all instances, detract significantly from the character of place.	The LPAs' recognition of this point is noted. The Applicant also understands that there is need for care when proposing planting as mitigation, as the planting in itself may give rise to changes in landscape character and visual amenity. This has been carefully considered as part of the Project design within Environmental Areas.
Annex C, 1.2	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	Rolling Valley Farmlands and Furze LCT – BMSDC would query that the operational effect would only be moderate significant adverse within 1Km, as the presence of the 50m high pylons and overhead lines would likely have an impact on the sense of rurality and tranquillity of most of Wortham Ling and its setting. BMSDC query the Distinctiveness judgement of Low-Medium and the overall judgement of the value assessment as Medium. Functional value does not appear to value the provisioning role of farmland.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
Annex C, 1.3	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	Wooded Valley Meadowlands and Fens LCT – BMSDC do not agree that significant adverse landscape effects, particularly indirect ones, would be limited to 0.5Km as the valley bottom is quite open, for instance close to The Doit, over which the Project line crosses. BMSDC query the Distinctiveness judgement of Low-Medium when the key part of the character type is the distinctive flat	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.

ID	Stakeholder	Comment	NG response
	District Council	valley bottom and peat deposits. BMSDC query the Perceptual judgement of Low-Medium when this is substantially a rural landscape in good condition. Functional value does not appear to value the provisioning role of farmland itself.	
Annex C, 1.4	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	Ancient Plateau Claylands – such as experienced at Mellis Green and its setting, Stowupland, Creeping St Peter, Burstall, Barking Tye, Elmsett, Great Bricett. BMSDC query whether the operational effects would be significant adverse only at 1Km or less. These areas are characterised by flat or gently rolling arable clay landscapes where the presence of the 50m high pylons and overhead lines would have an extended impact on the sense of rurality and tranquillity of the countryside, and the experience of its amenity and aesthetic value. BMSDC query the identification of the Cultural Heritage value, Distinctiveness and Perceptual character of the landscape as low-medium. Mellis has strong associations with Roger Deakin author of Waterlog so should be judged at least Medium. BMSDC would judge the recreational value as Medium- High due to the Open Access land. Functional value does not appear to value the provisioning role of farmland itself, and BMSDC would ask these judgements are reevaluated to encompass a full range of ecosystem services.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
Annex C, 1.5	Suffolk County Council and Babergh District Council and	Plateau Claylands – a landscape of heavy clay soils very gently undulating or flat dissected by small streams, such as is found at Gislingham, Dandy Corner, Cotton and Mendlesham. Due to topography and lack of substantial woodland BMSDC do not agree that adverse effects would only be judged as	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.

ID	Stakeholder	Comment	NG response
	Mid Suffolk District Council	moderate significant close to the project line but would judge these effects as major significant up to 1Km. Indirect effects on the landscape would extend beyond 1.5Km affecting its sense of place and history. Much of the setting is deeply rural with single track lanes with few existing detractors.	
Annex C, 1.6	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	Valley Meadowlands LCT This is a narrow, linear LCT occurring in two discrete areas. The northernmost area follows the course of the River Gipping and its tributaries, north and west of Needham Market and west of Ipswich. The southernmost area follows the course of the River Brett to the west of Raydon. The LCT would be directly affected by construction works undergrounding of an existing 132 kV overhead line where it crosses the Project near Badley Hill, including a CSE compound. BMSDC do not agree that likely significant effects would be limited to moderate and to 0.5Km from the Project line, especially once operational, due to the height and linear extent of the Project. Due to their intimate character valley landscapes contribute considerably to a sense of place and history which would be affected by strongly industrial infrastructure at a local level. BMSDC do not agree with the judgement of Distinctiveness value as Low-Medium when the river valley floor forms such a distinct characteristic of this landscape type.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
Annex C, 1.7	Suffolk County Council and Babergh District Council	Rolling Valley Farmland This occurs at six discrete areas, following the valleys of tributaries of the River Gipping, Belstead, Brook, River Brett and River Stour. The LCT would be directly affected by construction activity southwest of Willisham Tye,	The position of the LPA is noted. The Applicant has identified significant adverse effects on the Rolling Valley Farmland LCT up to approximately 1.5 km from the LoD, as set out in paragraphs 13.3.300 to 13.3.309 of 6.13.A2 Environmental Statement Appendix 13.2

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	Council and Mid Suffolk District Council	west of Oton, near Washbrook Street, and along the proposed cable route north-west of Stratford St Mary, within Dedham Vale National Landscape. BMSDC do not agree that the likely significant negative effects on this LCT would be limited to 0.5Km from the Project line. Due to their intimate character valley landscapes contribute considerably to a sense of place and history which would be affected strongly at a local level by such industrial infrastructure. BMSDC query the Distinctiveness value being judged as low-medium when the LCT description notes the 'gentle valley sides with some complex and steep slopes'. There are some towns and villages with 'distinctive' medieval cores and late medieval churches.	- Landscape Baseline and Assessment [APP-228]. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
Annex C, 1.8	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	The Plateau Farmlands LCT This occupies two discrete areas. The smaller, northern most area lies to the west of Ipswich. The larger, southern most area encompasses Holton St Mary and East Bergholt, and the southern edge of the LCT is within Dedham Vale National Landscape. These would be directly affected by construction activity, west of Ipswich and west of Holton St Mary. BMSDC agree that the likely significant negative effects on this LCT would be limited to 1.0Km from the Project line. BMSDC do not agree that the likely significant negative effects on this LCT would be limited to 0.5Km from the Project line due to the gently rolling and open plateaux landform providing extensive intervisibility of the landscape notably west of Sproughton affecting the sense of isolation and tranquillity.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.

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Annex C, 1.9	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	The Ancient Estate Farmlands LCT The Ancient Estate Farmlands LCT occurs to the south-west of Ipswich and includes the settlement of Washbrook. Due to the Ancient Estate Farmlands LCT being only indirectly affected by a relatively small amount of construction activity, BMSDC agree that the effect on the LCT would likely be negative but likely not significant at the construction stage and there would likely be no effect once the Project was operational. BMSDC query the judgement of Cultural Heritage value being seemingly assessed purely in terms of listed buildings. A consideration of the farmed landscape which offers a dimension of time depth needs to be added. BMSDC query the Perceptual Scenic value being judged as Low when the open, flat landscape is part of the key character of the landscape.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
Annex C, 1.10	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	The Wooded Valley Meadowlands LCT These occur along the River Stour within the Dedham Vale National Landscape (an Area of Outstanding Natural Beauty (AONB), to the east of Stratford St Mary. BMSDC agree the indirect effect on the LCA at construction would likely be negative but not likely to be significant and there would likely be no effect once the Project was operational. BMSDC query the Medium judgment for Natural Heritage value when part of an SSSI and a Ramsar site are in the LCT. BMSDC query the Distinctiveness value being judged as Low when the character type is mainly formed by the distinctive valley floor.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
Annex C, 1.12, 1.19, 1.22, 1.29,	Suffolk County Council and	BMSDC do not agree with the approach to value of the view which ignores the general role of views/vista/intervisibility in the Landscape Character	The approach to the Landscape and Visual Impact Assessment (LVIA) follows professional guidance, including GLVIA3, as set out in 6.13.A1

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1.35, 1.40, 1.45, 1.47, 1.50, 1.54, 1.61, 1.66, 1.71, 1.76, 1.83, 1.87, 1.90, 1.93, 1.96	Babergh District Council and Mid Suffolk District Council	Assessment. BMSDC do not accept that the visual sensitivity to this sort of infrastructure is low.	Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]. This method was shared and discussed with stakeholders. Paragraph 6.37 of GLVIA3 suggests that judgements made about the value attached to views experienced should take account of: • Recognition of the value attached to particular views, for example in relation to heritage assets, or through planning designations • Indicators of the value attached to views by visitors, for example through appearances in guide books or on tourist maps, provision of facilities for their enjoyment (such as parking places, sign boards and interpretive material) and references to them in literature or art (for example ‘Ruskin’s View’ over Lunedale, or the view from the Cob in Porthmadog over Traeth Mawr to Snowdonia which features in well-known Welsh paintings, and the ‘Queen’s View’ in Scotland). The visual assessment has been undertaken based on consideration of views experienced from a number of Visual Receptor Areas (VRAs). This is cross referenced to and supplemented by 206 viewpoint assessments, many of which are supported by photomontages and wirelines. The approach to the identification of VRAs is set out in paragraph 13.4.48 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]. The assessment of visual effects on each VRA is presented in 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The assessment of visual effects considers judgements on susceptibility of visual receptors and values of views to inform overall sensitivity judgements.

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			Paragraphs 13.3.1 to 13.3.5 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229] set out the approach taken in relation to the assessment of effects on the VRA. Paragraph 13.3.2 explains that ‘<i>a range of receptor sensitivities were identified within each VRA</i>’ and that the ‘<i>assessment takes into consideration the highest sensitivity identified</i>’. This allows for consideration of a worst-case scenario and prevents underplaying judgements of visual effects. The Applicant is confident the assessment of visual value is based on a robust and consistent approach in line with professional guidance set out in GLVIA3.
Annex C, 1.14	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	It is also identified that the Project would be visible in close views from the east of the Visual Receptor Area and in some longer-range views, where the tops of pylons would be seen above existing vegetation. The views from VP 2.22 Lion Road near St John’s House / Goodrich Park are taken from 400m away. Wireframes are needed from these viewpoints to demonstrate that there is no likely significance beyond 1.5Km.	GLVIA3 advocates a proportionate approach to identifying viewpoints, stating that ‘<i>The emphasis must always be on proportionality in relation to the scale and nature of the development proposal and its likely significant effects, and on agreement with the competent authority and consultation bodies</i>’ (GLVIA3, paragraph 6.21). The number of viewpoints assessed in the LVIA (206) is considered to be proportionate and appropriate in relation to the scale of the Project. In addition, there are a further 47 viewpoints and accompanying visualisations that support the historic environment assessment. During consultation, a number of viewpoints were requested by Local Planning Authorities. Some of these were not included in the assessment; this was due to either a lack of potential visibility of the Project (due to screening or filtering of views by landform, buildings or vegetation), or the area in question being represented by an alternative viewpoint(s).

ID	Stakeholder	Comment	NG response
			The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints, however, if parties consider the provision of additional wirelines helpful, then they could be provided.
Annex C, 1.15	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	It is also likely that close views would include views from the Waveney Valley, notably from The Doit (also Angles Way PRoW) north to the proposed pylons on the northern side of the Waveney, and BMSDC judge a wireline visualisation is needed at this location.	Views from The Doit / Angles Way are represented by Viewpoint 1.22: Doit Lane near Roydon, which is located on the Suffolk / Norfolk border, see 7.12 Visualisations - Part 1 of 9 [APP-343]. Historic Environment Viewpoint HE2i: Church of St Remigius, Roydon - Angles Way is located on the Angles Way to the east of The Doit, see 7.12 Visualisations - Part 8 of 9 [APP-350]. The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints, however, if parties consider the provision of a wireline helpful then this could be provided.
Annex C, 1.16	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	The assessment states that between approximately 0.5 km and 1 km the overhead line would most often be seen on the skyline above intervening layers of vegetation from the local road and PRoW network citing the visualisation for Viewpoint 2.04 Burgate as an example that demonstrates this. However, this shows that a major part of the pylons and wires would be visible in the middle-distance, not on the horizon, as the term 'skyline' implies.	The term 'skyline' has been used in the LVIA where the Project would be viewed against the backcloth of the sky, irrespective of distance.
Annex C, 1.17	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	However, additional wireframe images are needed from medium-long distance viewpoints to demonstrate that there is no likely significance beyond 1.5Km as well as a wireframe from The Doit to demonstrate the extent of the negative effect of the Project on the Waveney Valley itself from the Suffolk side.	See the responses to ID Annex C, 1.14 and 1.15 (Suffolk County Council and Babergh District Council and Mid Suffolk District Council). The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints, however, if parties consider the provision of further wirelines helpful then these could be provided.

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	District Council		
Annex C, 1.13	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	B1: Wortham Operation: At operation, it is identified that within approximately 0.5 km of the Project, there would be close views of the overhead line from the local road and PRoW network. Pylons and the overhead line would also dominate views from VP 2.01 Wortham Ling, where the viewpoint is only 400m from the Project at its closest point. Wortham Ling is important as it is open access land, thus allowing views from many different angles. BMSDC query whether the impact is major significant up to more than 0.5Km i.e. 1.0Km. BMSDC cannot judge whether beyond 1.5 km the scale of change would be small, and the magnitude of effect would be low. Or that the effect would be minor and not significant (adverse) as a visualisation or wireline from beyond 1.5Km is not provided.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair. The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints, however, if parties consider the provision of further wirelines helpful then these could be provided.
Annex C, 1.20	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	B2: Palgrave Operation: BMSDC do not accept that the effects on visual receptors would likely be major significant (adverse) only within 0.5 km of the draft Order Limits. VP 2.03 ProW at Palgrave is taken 0.78Km from the project line and BMSDC suggest demonstrates that at this distance there is still a major significant adverse effect due to the sheer extent, density and height of the Project. The landscape at this point consists of large-scale arable fields, providing open views with intermittent boundary vegetation. BMSDC agree that up to 1.5 km, effects would likely remain significant but moderate. BMSDC welcome Viewpoint 2.31 New	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.

ID	Stakeholder	Comment	NG response
		Road / PRow north-east of Thrandeston as an additional viewpoint from 1.89Km in order to demonstrate no significant effects from beyond 1.5Km, however, this is partly dependent on there being topography or vegetation screening the horizon line.	
Annex C, 1.24	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	B3 Mellis It is stated that 'The Project would be seen on the skyline and layers of field boundary vegetation would filter views.' However, that is truer to the west of Mellis Green rather than to the north-west where views are far more open and the impacts far more substantial.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair. Views from Mellis looking to the north-west are represented by Viewpoint 2.05: Mellis Road, Mellis Green.
Annex C, 1.30	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	B4 Finningham and Gislingham BMSDC generally agree that effects on visual receptors would likely be significant (negative) within approximately 1.5km of the Project at operational stage, and that between approximately 2 km and 3 km distance and layers of vegetation would reduce visibility of operational effects. Viewpoint 2.07 PRow south of Gislingham demonstrates the major significant adverse effects that would result. BMSDC do not agree that all effects from Gislingham reduce to moderate significant.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
Annex C, 1.31	Suffolk County Council and Babergh District Council	VP2.09 Dandy Corner which is 0.66Km from the Project line demonstrates the major negative effects that will occur from this distance where there is an open and wide view. This visualisation should have been presented as a photomontage. It would	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.

ID	Stakeholder	Comment	NG response
	Council and Mid Suffolk District Council	dramatically affect the experience of the landscape including the perception of its tranquillity and rurality in a place where there is a strong sense of isolation. This image contradicts the claim that the Project would be filtered and screened by intervening woodland and mature boundary vegetation or be seen on the 'skyline'. At best the project appears prominently in the middle distance.	The term 'skyline' has been used in the LVIA where the Project would be viewed against the backcloth of the sky, irrespective of distance. The Applicant agrees that the Project would be visible in the middle (and longer) distance from Viewpoint 2.09: Dandy Corner, as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints, however, if parties consider the provision of further photomontages helpful then these could be provided.
Annex C, 1.32	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	Similarly, as VP 2.11 Middy Railway Footpath is 0.32km distance from the Project line and shows it creates major significant adverse effects where there is an open view and therefore a significant negative impact as a result. Whilst not impacting directly on views from the centre of Mendlesham, the overhead line and pylons will have a profound effect on the setting of the village and the perception of its rurality. BMSDC judge it is likely the significant major adverse effects could be visible to 1 Km.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair. From Viewpoint 2.11 the Applicant agrees that effects would be major and significant (adverse), as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229].
Annex C, 1.38	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	Viewpoint 2.53 Mid Suffolk Footpath near Mendlesham: the visualisations do not appear to be included in the figures.	Viewpoint 2.53: Mid Suffolk Footpath near Mendlesham is represented by a baseline photograph only, as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints, however, if parties consider the provision of further wirelines helpful then these could be provided.

ID	Stakeholder	Comment	NG response
Annex C, 1.41	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	B6 Stowupland There are no close viewpoints in this VRA so BMSDC cannot judge whether major significant impacts are limited to 0.5Kms. Judging from other VRAs BMSDC would suggest major impacts extend up to 1 Kms. It is identified that close and medium distance views at operation stage will be had from local lanes, the PRoW network including the Mid Suffolk Footpath, scattered properties, Saxham Street and the eastern fringes of Creting St Peter. VP 2.12 Mid Suffolk footpath is 1.24Km from the Project line, looking east/southeast gently sloping towards the viewpoint giving wide open views of a large-scale arable landscape with few or no detractors. The lanes are single track, quiet and rural. The overhead line is clearly visible across a wide area creating significant effects even from this distance. BMSDC agree effects are significant up to 1.5Kms. There are no viewpoint assessments and visualisations greater than 1.5 kms in this area therefore some need to be identified beyond this to demonstrate that effects are not significant beyond 1,5Kms. There is more topography towards the River Gipping and Gipping Great wood where there is an undulating/sloping valley landscape.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair. See the response to ID Annex C, 1.14 (Suffolk County Council and Babergh District Council and Mid Suffolk District Council) for response on viewpoints.
Annex C, 1.51	Suffolk County Council and Babergh District Council and Mid Suffolk	BMSDC query the quality of the images from Viewpoint 2.27 All Saints Road, Creting Hills and also that only a wireline has been provided when this is an elevated viewpoint with wide views.	The position of the LPA is noted. The conclusions of the LVIA will not change as a result of adding new photographs or photomontages to replace wirelines, however, if parties consider the provision of further photomontages helpful then these could be provided.

ID	Stakeholder	Comment	NG response
	District Council		
Annex C, 1.56	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	B10 Great Bricett VP 2.18 Great Bricett 1.65Km This is an open gently undulating quite large-scale arable landscape. The B1078 traffic is quite fast but intermittent. There are few other visible detractors. Wattisham Flying Station is close by but there is no sense of it at this point. There are distant pylons to the east of the view. BMSDC judge the impacts remain moderate significant even at 1.65KM. BMSDC would therefore query that effects on visual receptors at operation would likely be significant (negative) only within approximately 1.5 km.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
Annex C, 1.58	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	Generally, BMSDC agree the effects of the Project would remain major and significant (adverse) within 0.5 km and at Badley; moderate and significant (adverse) between 0.5 km and 1.5 km. However BMSDC dispute that impacts at Ringshall are minor and not significant (adverse)	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
Annex C, 1.61	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	B11 Barking and Willisham BMSDC consider the use of the term 'skyline' in near view descriptions is mis-leading as it implies a certain distance between the viewer and the view. BMSDC suggest the term middle distance is more appropriate.	The term 'skyline' has been used in the LVIA where the Project would be viewed against the backcloth of the sky, irrespective of distance.

ID	Stakeholder	Comment	NG response
Annex C, 1.73	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	B13 Somersham It is identified in the assessment, that at completion, there would be some medium to long distance views of the Project from elevated areas between approximately 1 km and 2 km. However, VP 2.25 Nettlestead Road, Nettlestead is taken from 1.97Km from the Project line on elevated land to the northeast of Nettlestead. It shows the existing pylons dominating about 25% of the existing view, but the proposed ones extend both the extent and intensity of the existing infrastructure to the point where the whole view is dominated by infrastructure. It seems unlikely that even at 2 Kms in elevated and open landscape that this extent and density of 'wirescape' will not appear significant. In the south of the Visual Receptor Area the completed Project line would be seen in the context of existing electricity infrastructure.	The position of the LPA is noted. The Applicant agrees that effects at Viewpoint 2.25: Nettlestead Road, Nettlestead would be moderate and significant (adverse), as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230]. Viewpoints were typically selected at maximum or worst case locations (i.e. open areas of higher sensitivity, with the clearest views). They are not always an exact proxy for visual effects across the VRA as a whole.
Annex C, 1.74	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	BMSDC agree generally the effects of the Project would be major and significant (adverse) within 0.5 km, however BMSDC do not agree it is moderate and significant (adverse) at Ofton; moderate and significant (adverse) between 0.5 km and 1.5 km but also at Nettlestead and minor and not significant (adverse) beyond 1.5 km.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
Annex C, 1.80	Suffolk County Council and Babergh District Council and	C1 Burstall Between approximately 1 km and 2 km construction activity and the operational pylons are described as 'would likely be perceptible in some medium to long distance views', and 'form a component 'in some medium to long distance views, yet the visualisation	A minor and not significant (adverse) effect is identified from Viewpoint 3.06: PRoW, Hintlesham (Hintlesham 27), as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230].

ID	Stakeholder	Comment	NG response
	Mid Suffolk District Council	from Viewpoint 3.06 PRoW Hintlesham at 1.6Kms distance shows that the effects are more than perceptible. This landscape is likely to be affected by the proposed Bramford to Twinstead Reinforcement and forms part of the historic park of Hintlesham Hall so the cumulative effects on this landscape could be major.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair. The Applicant agrees that the cumulative landscape and visual effects resulting from the Project and Bramford to Twinstead would be significant, as set out on page 6 in Table A17.3.1 in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284].
Annex C, 1.88	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	The applicant has only provided a baseline photograph for Viewpoint 3.29, however, which is not acceptable even though the viewpoint distance is 2.37Km. BMSDC cannot agree the significance of effects without a visualisation from Viewpoint 3.29.	The conclusions of the LVIA will not change as a result of adding new visualisations, however, if parties consider the provision of further visualisations helpful then these could be provided.
Annex C, 1.91	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	Viewpoint 3.05 Chattisham, NCR Route 1 is taken from 0.6Km so just outside the 'Close view' definition. However, the pylon line is still a dominant feature in about 75% of the visualisation and BMSDC judge a major significant impact. Viewpoint 3.25 PRoW near Woodlands Hall is taken from 0.6Km and illustrates the dominant impact of the CSE compound from this distance which BMSDC judge is also major significant without mitigation. Viewpoint 3.08 NCR 1, Woodlands Road taken from 1Km distance illustrates how the overhead line is still of moderate i.e., of significant impact at this distance. BMSDC agree that significant effects remain up to 1.5Kms	As set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230] the following effects were identified: • Moderate and significant (adverse) at Viewpoint 3.05: The Street / NCR 1, Chattisham • Moderate-major and significant (adverse) at Viewpoint 3.25: PRoW near Woodlands Hall (Raydon 5) • Moderate and significant (adverse) at Viewpoint 3.08: NCR 1, Woodlands Road. The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and

ID	Stakeholder	Comment	NG response
			remains comfortable that the matters raised have been considered and that the assessment is fair.
Annex C, 1.93	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	C5 Capel St Mary Operational: The assessment identifies close views towards the CSE compound, from the local road and ProW network, NCN Route 1, as well as scattered properties and close to medium distance views from the local road and PRoW network (as represented by Viewpoint 3.04 Church Lane Washbrook). Other receptors would include NCN Route 1, as well as a relatively small number of scattered and clustered properties such as those along Wenham Road. Viewpoint 3.04 Church Lane Washbrook is taken from 0.8Km away from the Project line. The visualisation demonstrates the widespread and significant impact of the line at this point with dozens of pylons dominating the fore and middle ground. This is a landscape with some infrastructure visible on the horizon but this is c4Kms away and so currently barely perceptible in the wider landscape. It is disingenuous to state the overhead line would most often be seen on the skyline, above intervening vegetation and hedgerows when the visualisation clearly shows the proposed overhead line in the foreground of view. Likewise, to state that between approximately 1 km and 2 km the overhead line would only be 'perceptible' in some medium to long distance views is not borne out. In Viewpoint 3.09 Little Wenham completely understates the visibility of the line in this visualisation from 1.4Km distance, when the overhead wires and pylons are clearly visible in the mid-ground.	The term 'skyline' has been used in the LVIA where the Project would be viewed against the backcloth of the sky, irrespective of distance. A moderate and significant (adverse) effect is identified from Viewpoint 3.09: PRoW, Little Wenham (Wenham Parva 14), as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230]. The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.

ID	Stakeholder	Comment	NG response
Annex C, 1.97	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	C6 Raydon The Project would be undergrounded within this Visual Receptor Area. The assessment identifies close views of construction activity associated with the underground cables from the local road and PRow network, including the B1070, NCN Route 48, as well as scattered properties and the eastern and southern edges of Raydon. People using Noaks Road and Sulleys Hill Road, which are designated as Quiet Lanes would also have close views towards this activity. Viewpoint 3.24 Higham Hill which is located outside this area to the south-west within Dedham Vale National Landscape identifies that the finished infrastructure is likely barely perceptible if at all. However, between approximately 1 km and 2 km the overhead line would be perceptible in some limited medium to long distance views from a small part of the north-east of this area. A VP 3.10 had been identified on Figure 13.7 but there is no viewpoint photograph and visualisation. These would be useful to demonstrate that views from the north-east are only 'perceptible'. Generally, BMSDC agree with the assessment judgements.	There is no Viewpoint 3.10 on 6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [REP1-066]. Viewpoint 3.10 was located at the eastern edge of Raydon but was removed following relocation of the CSE compound further north (now Wenham Grove CSE compound) due to limited theoretical visibility of the Project. The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints, however, if parties consider the provision of further visualisations helpful then these could be provided.
Annex C, 1.100	Suffolk County Council and Babergh District Council and Mid Suffolk District Council	C7 Holton St Mary and East Bergholt BMSDC accept that visual effects on visual receptors would generally be significant (negative) within approximately 1 km of the draft Order Limits. However, it is important that a close view of the CSE is provided to demonstrate the extent of the effects of that piece of permanent infrastructure and the beneficial effects or not of any proposed mitigation.	Close views towards Wenham Grove CSE compound are represented by Viewpoint 3.25: PRow near Woodlands Hall (Raydon 5), which is 0.45 km from the Project. The photomontage from Viewpoint 3.25 illustrates landscape mitigation around the CSE compound at year 1 and year 15, as shown in 7.12 Visualisations - Part 4 of 9 [APP-346].

ID	Stakeholder	Comment	NG response
		i. C8 (Undergrounding section – 1 km buffer) Higham ii. C9 (Undergrounding section – 1 km buffer) Stratford St Mary	
4.10.18 and 4.10.20	Essex County Council	4.10.18 At the operational stage it is identified that significant landscape effects are predicted within 1.5Kms of the project line. However, many of the judgements suggest these impacts are moderate significant rather than major significant beyond 0.5Kms, which ECC question. This is particularly true where multiple pylons 50m high are visible in sequence coupled with the overhead line and often in landscapes where intervisibility is high. 4.10.20 ECC position is that at the operational stage impacts are likely to still be major significant rather than moderate significant beyond 0.5Kms.	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] and was shared and discussed with stakeholders. The judgements were informed by detailed desk and field studies, and the findings are supported by detailed explanations in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] and also 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232] and illustrative materials on Figures 13.1 to 13.19 of the ES (6.13.F1 to 6.13.F19 [APP-237 to APP-255]). The assessment team, which includes highly experienced Chartered Members of the Landscape Institute, has thoroughly explored potential effects on landscape out to 3 km from the Project, and their findings and judgements are set out in an objective and consistent manner. It is considered that the judgements made remain fair and reasonable and that no changes need to be made.
4.10.19	Essex County Council	The visualisations demonstrate that, the landscapes affected by the project are substantially undeveloped and rural where intervisibility is often high due to large scale flat or gently undulating landscapes or shallow river valleys, where the scale of the pylons and overhead wires means the effect is to industrialise the countryside in places up to	Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the LVIA Study Area, as illustrated on 6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240].

ID	Stakeholder	Comment	NG response
		2Km away. These are often landscapes without existing significant detractors.	Whilst the rural landscape will remain in place beneath and around the proposed overhead line, it is nevertheless recognised by the Applicant that significant effects on landscape character and visual amenity will occur. These effects are reported in the LVIA in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] .
4.10.23	Essex County Council	ECC welcomes the 206 Viewpoint assessments that have been identified over the whole project length which is a considerable increase on the number presented in the PEIR, but note that there are still considerable gaps in the provision including in VRA C12 Ardleigh (Longer distance), VRA D3 Great Horkesley and Horkesley Heath (Longer distance) VR10 D10 Copford VRA E3 Kelvedon VRA E4 Silver End (Longer distance), VRA F9 Edney Common (Longer distance) VRA F6 Chelmsford North-West (Longer distance) VRA G3 Brentwood East (Longer distance) VRA H1 Bulphan (Longer distance) VRA H2 Horndon on the Hill (Longer distance). The shortfall is particularly noticeable from beyond 1.5 Kms and is in danger of undervaluing the significance of the effects on the PRow network in particular.	The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The viewpoints were shared and discussed with relevant Local Planning Authorities, as set out in the Statements of Common Ground (5.9.1 to 5.9.12 [REP1-010 to REP1-032]). The LVIA viewpoints are a representative selection of publicly accessible locations along the Project, capturing a range of receptors and a variety of distances and viewing directions. The locations of all viewpoints are shown on 6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [REP1-066]. This includes viewpoints beyond 1.5 km within Chelmsford district. The number of viewpoints assessed in the LVIA (206 viewpoints) is considered to be proportionate and appropriate in relation to the scale of the Project. These are presented in 7.12 Visualisations [APP-343 - APP-349]. In addition, there are a further 47 viewpoints and accompanying visualisations that support the historic environment assessment. These are presented in the 7.12 Visualisations [APP-350 - APP-351]. It is important to note that the LVIA is based on first hand observations during site visits and not on viewpoints and visualisations alone.

ID	Stakeholder	Comment	NG response
4.10.25, 4.10.26 and 4.10.27	Essex County Council	ECC considers that the visual assessment should more explicitly extend into sensitive areas beyond the 3Km line including the National Landscape in order to demonstrate the effects are not significant. Figure 13.15 - Landscape and Visual -ZTV of Fairstead (EACN Side) and Fairstead (Tilbury Side) CSE Compounds (APP-251) shows that theoretical visibility of the whole structure of the substation is extensive and goes beyond the 3 Km study area in several places. ECC consider that the visual assessment should more explicitly extend into sensitive areas beyond the 3Km line in order to demonstrate the effects are not significant. Figure 13.9 - Landscape and Visual - ZTV of Proposed 400kV Overhead Line (proportions of structures visible) (APP-245) indicates relatively widespread theoretical visibility of the whole pylon structure and overhead line both within the 3 km study area and beyond 5Km, including from villages, the PRow network, National Cycle Network routes in this area, from the rural lanes and road network. This highlights how widespread the potential significant negative landscape and visual effects of the scheme are and also suggests that some visual assessment needs to extend beyond the 3Km study area	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]. This was shared and discussed with stakeholders. This methodology sets out the justification for the 3 km Study Area used for the assessment. This was determined by the nature and scale of the Project and the nature of the surrounding area and considers the landscape and/or views that the Project may influence in a significant manner. The following viewpoints are located beyond 3 km from the nearest above ground structure within Essex (approximate distance provided in brackets): Viewpoint 5.01 (3.2 km), Viewpoint 6.22 (3.1 km), Viewpoint 6.25 (3 km) and Viewpoint 8.09 (4 km). No significant effects were identified at these viewpoints as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232].
6.2.15	Thurrock Council	Where there are PRowS within 400m of the proposed pylons, the effects on users will be major and significant. The effects on users of PRowS more that 400m from the site will not be significant.	The LVIA assessment summary of visual effects in Thurrock is set out in paragraph 13.7.26 in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The LVIA recognises that significant visual effects during operation, will extend up to approximately 1.5 km from the proposed overhead line in Thurrock. The most significant (major

ID	Stakeholder	Comment	NG response
			and moderate significant adverse visual effects) will be within approximately 0.5 km. There will be some moderate and significant adverse visual effects between approximately 0.5 km and 1.5 km.
6.2.19	Thurrock Council	The proposed replacement planting must be undertaken at the earliest opportunity.	The drafting of Requirement 9 of the 3.1 Draft Development Consent Order [APP-056] confirms that reinstatement planting works will be implemented at the earliest opportunity. Requirement 9 makes it clear that the latest point at which the reinstatement planting works may be carried out is the first available planting season after the relevant part of the authorised development is brought into operational use. The Applicant may find itself in a situation where it could carry out reinstatement planting in the current planting season, rather than waiting until the next planting season.
3.1.3 and 11.2.1 (first bullet)	South Norfolk District Council	3.1.3 South Norfolk's generally open and gently rolling landscape gives rise to expansive views across the district. The introduction of tall pylons and overhead lines will create prominent visual features within several landscape character areas. Veteran tree loss, hedgerow removal and long-term vegetation management within the operational corridor are of particular concern. Any tree loss and hedgerow removal must be kept to a minimum and the applicant should be required to justify any such loss. This information is not currently available. The Council therefore cannot assess whether any loss will be inevitable or unavoidable. 11.2.1 The Council wishes to highlight the following residual harms as key matters requiring the Examining Authority's attention:	The Environmental Statement is based on an assumed worse case tree and hedgerow removal, as detailed within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] and illustrated in the Arboriculture Impacts Plan (Figure A13.6.1) in 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]. Paragraph 8.2.3 of 7.4 Outline Landscape and Ecological Management Plan (Revision C) confirms that, following detailed design and prior to construction, relevant surveys will be undertaken to reduce removal of trees/hedgerows as far as practicable, and this is recorded as commitment GG14 within 7.2 Outline Code of Construction Practice (Revision B). Measures to avoid/mitigate impacts to all trees (including veterans) are also captured as a Project commitment LV05 in 7.2 Outline Code of

ID	Stakeholder	Comment	NG response
		Landscape and visual harm: The scale and prominence of the 400kV pylons, combined with the district's open topography, result in significant and long-lasting adverse effects, including the removal of veteran trees and loss of rural tranquillity (<i>first bullet point</i>)	Construction Practice (Revision B) . Section 9.4 of 7.4 Outline Landscape and Ecological Management Plan (Revision C) outlines the commitment to reinstate hedgerow field boundaries. Veteran trees are included within 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323] as well as 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]. The assessment of impacts on veteran trees contained in these documents does not identify any requirement for the removal of veteran trees in South Norfolk. A number of veteran trees have been identified as 'potentially affected' in South Norfolk should the Limits of Deviation be triggered. During detailed design the Contractors will seek to deliver the overhead line whereby veteran trees identified as 'potentially affected' remain unaffected as per commitment B08 in 7.2 Outline Code of Construction Practice (Revision B) . A Reinstatement Planting Plan is secured under Requirement 9 of the 3.1 Draft Development Consent Order [APP-056].
3.1.8	South Norfolk District Council	The Council remains concerned that the cumulative impacts of these proposed and consented developments, located around Norwich Main and throughout the district close to the draft Order limits, when considered alongside the proposed overhead pylons, will result in significant harm to the district's rural landscape.	The cumulative effects of the Project have been assessed within 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. This includes an assessment of cumulative effects on landscape and visual receptors. Significant cumulative landscape and visual effects (moderate adverse) are reported for the following receptors during construction and operation: Tas Tributary Farmland LCA B1 (page 39)

ID	Stakeholder	Comment	NG response
			• VRA A1 Swardeston (page 51) • VRA A2 Stoke Holy Cross (page 52).
8.2.5	South Norfolk District Council	<i>Operational Impacts</i> Removal of veteran trees, which are irreplaceable under the NPPF, represents a particularly significant adverse effect. The operational corridor limits the feasibility of meaningful replanting.	As per the response to South Norfolk District Council ID 3.1.3 the Applicant confirms the assessment of impacts on veteran trees does not identify any requirement for the removal of veteran trees in South Norfolk. A number of veteran trees have been identified as ‘potentially affected’ in South Norfolk. At detailed design the Contractors will seek to deliver the overhead line to minimise impacts to trees overall, as per commitment B08 in 7.2 Outline Code of Construction Practice (Revision B).
8.2.6	South Norfolk District Council	<i>Cumulative Landscape Effects</i> The proposed scheme forms part of a wider cluster of energy infrastructure around Norwich Main Substation and throughout the district. When combined, these developments result in substantial cumulative landscape change.	Please refer to the Applicant’s response to South Norfolk District Council ID 3.1.8.
10.6.2	South Norfolk District Council	The cumulative effect of two parallel overhead line systems (existing 132kV and proposed 400kV) is of particular concern due to their combined visual dominance.	The Project does not run parallel to an existing 132 kV overhead line in South Norfolk District. The Project runs broadly parallel to and within 500 m west of an existing 400 kV overhead line (known as the 4YM route) between Norwich Substation and Newton Flotman. To the west of Newton Flotman, the Project deviates further west moving beyond 500 m to approximately 2 km away from the existing 400 kV overhead line. The Project then remains between approximately 2 km to 5 km away from the existing 400 kV overhead line down to Diss. Existing overhead lines are considered as part of the landscape and visual baseline, against which the effects of the Project are assessed, as set out in

ID	Stakeholder	Comment	NG response
			Section 13.5 in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] and also within 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]
12.3.1 (last bullet point)	South Norfolk District Council	Appendix B – Maps and Plans This appendix contains relevant constraints maps, indicative routing plans, and landscape character area plans in the following Examination Library Documents. These include: Landscape Character Areas (Tas Valley, Tributary Farmland, Plateau Farmland, Waveney Rural River Valley) – Landscape Susceptibility in Relation to Energy Generation, Storage and Transmission SPD 2026 (<i>last bullet point</i>)	The Applicant notes that Appendix B of the Local Impact Report supports the assessments and conclusions presented within it. Appendix B is missing from the Planning Inspectorate website. It is assumed the last bullet point is made with reference to supplementary planning guidance which was adopted on 18 February 2026, which is available on South Norfolk and Broadland District Councils' website. The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
2.12	Tendring District Council	Individually and collectively, the N2T project and its associated infrastructure would cause significant and lasting harm to the local built and natural environment, to the nationally designated Suffolk & Essex Coast & Heaths National Landscape	The Applicant confirms that the Project would have no environmental effects on Suffolk & Essex Coast & Heaths National Landscape. The Project would have effects on Dedham Vale National Landscape as reported in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. Significant effects on the special qualities of Dedham Vale National Landscape are reported during construction. Once the Project is operational and the land has been restored, effects on the special qualities would not be significant.
12.6	Tendring District Council	In summary, ECC's and TDC's landscape analysis identify:	The Applicant notes the difference in opinion relating to judgements of landscape effects within Bromley Heaths LCA. The position of the LPA is noted. The Applicant

ID	Stakeholder	Comment	NG response
		- The Bromley Heaths LCA as highly susceptible to change, with the proposed N2T pylons resulting in major adverse impacts up to 1 km and significant effects out to 2 km. - The cumulative presence of offshore windfarm grid infrastructure risks transforming a currently undeveloped rural landscape into an “industrialised corridor.”	has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair. Cumulative effects of other developments alongside the Project are assessed in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281].
12.16	Tendring District Council	The following additional measures are considered necessary and reasonable given the cumulative harm that will ensue, the lack of appropriate and meaningful mitigation and project co-ordination measures put forward by the Applicant: Additional viewpoints and landscape analysis extending beyond 1.5 km for Section C, as ECC flagged significant gaps.	The Applicant notes the request relating to landscape and visual viewpoints. The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints. The Applicant confirms that the LVIA set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] comprises an analysis of landscape and visual effects up to 3 km of the Project, as set out in paragraphs 13.4.1 to 13.4.6 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227].
20.4	Tendring District Council	The ES confirms that Dedham Vale’s valley floor and ridge edges are highly sensitive and that the project would cause: - Major/significant construction effects on “iconic valley views” and “tranquillity.” - Moderate/significant effects on the valley meadowlands and riverine features.	The Applicant confirms that the ES reports these major and moderate significant effects on the special qualities of the Dedham Vale National Landscape during construction. Once the Project is operational and the land has been restored, effects on the special qualities of the National Landscape would not be significant. The assessment of effects on the special qualities of Dedham Vale National Landscape during construction and operation (and maintenance) is provided in paragraph 13.2.42 and Table A13.1.3 in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235].

ID	Stakeholder	Comment	NG response
20.5 & 20.6	Tendring District Council	TDC emphasises that the setting of the National Landscape extends well beyond the statutory boundary. In Tendring, the northern plateau edge above the River Stour is integral to: • the perception of a wide, rural, tranquil panorama, • Constable-country associations, • and the visual envelope experienced from key PROWs and recreational routes. The proposed concentration of pylons and supporting infrastructure in this location would: • introduce strong vertical and repetitive engineered lines, • erode the visual quietness and aesthetic simplicity essential to the National Landscape's special qualities, and • generate permanent discordant elements in cross-valley views.	As explained within the Applicant's responses to the Relevant Representations on page U3 of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132], the Project has been designed to minimise effects on Dedham Vale National Landscape, including consideration of the Project within the National Landscape and its setting. While there would be significant effects during construction due to the installation of underground cables, these would reduce and be not significant during operation. There would be no significant effects on the National Landscape as a result of the proposed new East Anglia Connection Node (EACN) Substation or overhead lines. The assessment of effects of the Project on Dedham Vale National Landscape is set out in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. The following figures contained within Annex B of 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] illustrate the extent of theoretical visibility of the overhead line within Tendring District: • Figure A13.5.8 – Landscape and Visual – Zone of Theoretical Visibility (ZTV) Pylons TB3 – TB12 • Figure A13.5.9 – Landscape and Visual – Zone of Theoretical Visibility (ZTV) Pylons TB13 – TB21. The viewpoint assessment contained within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230] illustrates the Project in relation to several views from within and the edge of Dedham Vale National Landscape including Viewpoints 3.15, 3.19 and 3.20.

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20.11	Tendring District Council	TDC argues NGET must return to first principles, repeat full arboricultural surveys on-site, and re-run route selection and design development using accurate, verified constraints mapping.	Aside from land parcels not granted access to survey, the arboricultural surveys and data collection have been undertaken in line with 6.19 Scoping Report - including appendices B to K [APP-296] with field-based surveys undertaken between May 2023 and May 2025, a summary of which can be found in paragraph 13.5.3 of the 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]. The Applicant does not consider a repeat full arboricultural survey, and re-run route selection and design development using accurate, verified constraints mapping is necessary as data the assessment is based on is accurate and appropriate.
12.43 - 12.44	Colchester City Council	<i>Langham to Great Horkesley (Eastern cable sealing end compound)</i> We query the Sensitivity assessment for this landscape as being Medium sensitive to this sort of infrastructure as this is an open, gently undulating landscape in which there is high intervisibility and for which 'long distance framed views' are characteristic. We consider the Sensitivity to be at least Medium – High. In relation to Construction effects, we do not agree that the effect would only be moderate and significant (adverse) within 1.5 km of the Order Limits. As we consider the landscape is at least of Medium-High Sensitivity we consider the effects would be moderate-major (adverse) at least for the first 0.5Kms. We agree the effect would be minor and not significant (adverse) beyond 1.5Kms.	The position of the LPA is noted. Between Langham and Great Horkesley, the Project passes through the Langham Farmland Plateau LCA and Great Horkesley Farmland Plateau LCA. The sensitivity of both is judged to be medium. Significant effects are identified within the Langham Farmland Plateau LCA within approximately 1.5 km of the Project during construction and operation, as set out in paragraphs 13.3.429 to 13.3.443 in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. Within the Great Horkesley Farmland Plateau LCA, where the Project would be partly undergrounded, effects are judged to be significant within approximately 1.5 km during construction and within approximately 0.5 km during operation (paragraphs 13.3.528 to 13.3.542). The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters

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			raised have been considered and that the assessment is fair.
12.46 - 12.47	Colchester City Council	In Visual Receptor Area D2 Little Horkesley and Wormingford, We agree that within 0.5 km of the project line, the scale of change would be large, the magnitude of effect would be high, and the effect would be major and significant (adverse). Viewpoint 4.27 B1508 Colchester Road, near Grove Lodge 0.12Km demonstrates the major significant adverse effect of the pylons close to. However, we disagree that major effects are limited to below 0.5KM and that between 0.5 km and 1.5 km the scale of change would necessarily be medium and the effect only moderate and significant (adverse). Whilst we agree that from Viewpoint 4.04 PRoW off Holt's Road, east of Wormingford (Little Horkesley 18) from 0.76Km, the visualisation does demonstrate a moderate significant adverse impact, we hold that in a more open landscape we consider the effects could remain major adverse up to 1Km.	The Applicant notes the agreement of the assessment within 0.5 km but respects the fact that there is a difference in professional opinion in relation to the assessment of effects beyond 0.5 km. The effects between 0.5 km and 1.5 km reported in the LVIA are identified as being significant (moderate adverse). The response provided suggests that Colchester City Council consider the visual effects to be greater than moderate. Although there is a difference in professional judgement in relation to the level of effect, the Applicant notes that both judgements would be significant. The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
12.50	Colchester City Council	<i>Western Cable Sealing End Compound to Fordham</i> During construction we do not accept that beyond 1Km, the valley topography and layers of vegetation including woodland, riparian vegetation, hedgerows, and field boundary trees would reduce intervisibility within the wider LCA, nor reduce the significant effects, due to the height of the infrastructure, during construction and at operation.	The position of the LPA is noted. Between the Western CSE compound and Fordham the Project passes through the Colne River Valley Slopes LCA and Colne River Valley Floor LCA. Significant effects are identified within approximately 1.5 km of the Project during construction and operation, as set out in paragraphs 13.3.543 to 13.3.572 in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.

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12.57	Colchester City Council	<i>Aldham to Braintree Border (via Marks Tey)</i> The effect on landscape character in the area is judged likely to be significant (negative) within approximately 1 km of the draft Order Limits. However, viewpoint 4.12 which views the Project from 1.2Km shows that the effects are still significant. Therefore, we cannot agree that once operational the effect on the LCA would only likely be significant (negative) within approximately 1 km of the Project.	The position of the LPA is noted. Between Aldham and the Braintree Border the Project passes through the Great Tey Farmland Plateau LCA and Easthorpe Farmland Plateau LCA. Significant effects are identified within approximately 1.5 km of the Project during operation, as set out in paragraphs 13.3.573 to 13.3.603 in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. The Applicant agrees that effects at Viewpoint 4.12: A120 Coggeshall Road, Marks Tey would be significant, as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231]. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
12.71	Colchester City Council	There is still a shortfall in viewpoints provided which is particularly noticeable from beyond 1.5 Kms and is in danger of undervaluing the significance of the effects on the PRow network in particular.	See the responses to ID Annex C, 1.14 and 1.15 (Suffolk County Council and Babergh District Council and Mid Suffolk District Council). The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints from PRowWs.
12.72	Colchester City Council	Largely, the majority of the landscape impacts will be limited in this section due to the undergrounding. However, as a result of removal of trees along Black Brook during construction, the character of this area will be altered significantly. Notably, the 2005 Landscape Character Assessment used by the applicant states that a key characteristic of the landscape is “intimate tranquil, relatively steep-sided river valley which is narrow in places and has the narrow meandering Black Brook running through the floodplain”. Within the 2025 Landscape Character	The Applicant notes that LCA A7: Stour River Valley Slopes is illustrated on pages 7 and 8 of 13 of 6.13.F6 Environmental Statement Figure 13.6 - Landscape Character Types and Landscape Character Areas [APP-242]. It is acknowledged that the sub areas of LCA A7: Stour River Valley Slopes, namely A7a, A7b and A7c, are not clearly illustrated on the figure. This will be amended within the next iteration of 8.1 Errata List [Revision B]. As set out in paragraph 13.3.486 to 13.3.500 in 6.13.A2 Environmental Statement Appendix 13.2 -

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		Assessment, it is noted that in LCA A7 includes “The wooded steeper tributary valleys, such as that of the Black Brook, and scattered woodland blocks create a sense of enclosure”. These characteristics will be fundamentally changed as a result of removal of trees, creating significant (adverse) effects within approximately 1 km during operation. Due to their intimate character valley landscapes contribute considerably to a sense of place and history which would be affected strongly at a local level. From the information given it is unclear if these long-term significant effects are within the National Landscape as the character sub areas are not clearly marked on the landscape character maps. The approach needs to be rethought if it results in significant residual adverse effects on the National Landscape.	Landscape Baseline and Assessment [APP-228], there will be major and significant effects within LCA sub area A7b: Stour River Valley Slopes, associated with the open cut crossing of Black Brook, outside the National Landscape. The landscape assessment explains there will be <i>‘a notable loss of trees within the construction swathe including a linear block of woodland in a field to the east of Springfield Farm, a section of woodland immediately north of Black Brook, riparian vegetation either side of the brook and overgrown hedgerows with hedgerow trees to the east of Grove Farm’</i>. The assessment acknowledges that construction would affect the tranquil and intimate character of sub area A7b, but states that these effects would be limited to within 0.5 km of the Order Limits. The National Landscape overlaps with LCA Sub Area A7b: Stour River Valley Slopes approximately 1 km west of the Order Limit. No construction effects would occur along Black Brook where it interacts with the National Landscape. The effects will be outside of the National Landscape boundary but within its setting as recognised in paragraphs A.5.37 to A.5.62 in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. The Applicant confirms that the ES reports major and moderate significant effects on the special qualities of the National Landscape during construction. Once the Project is operational and the land has been restored, effects on the special qualities of the National Landscape would not be significant. The assessment of effects on the special qualities of Dedham Vale National Landscape during construction and operation (and maintenance) is provided in paragraph 13.2.42 in

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			6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235].
12.73	Colchester City Council	Within visual receptor area C11 Langham, we agree that within 0.5 km the scale of change would be large, the magnitude of effect would be high and the effect would be major and significant (adverse). However, we disagree that between 0.5 km and 1.5 km the scale of change would be medium and the effect only moderate and significant (adverse). Whilst Viewpoint 4.01 Boxted Airfield Memorial, Park Lane visualisation from 1.16Km does demonstrate a moderate significant adverse impact, up to 1Km we judge the effects would still be major adverse. Whilst we agree that generally, beyond 1.5 km the scale of change would be small and effect would be minor and not significant partly due to intervening vegetation, Viewpoint 4.16 Langham Playing Field off School Road, Langham from 1.71Km indicates there are still effects, which we would suggest, in open sections of the landscape would be more significant.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
12.74, 12.200, 12.216, 12.228, 12.234, 12.239, 12.244, 12.249	Colchester City Council	We consider that the cumulative effect of multiple pylons and the continuous overhead linear character of the project, means that the collective effects within the VRA creates an overall significant adverse effect at both construction and operation.	The Applicant recognises that there will be significant effects on visual receptors at locations along the length of the Project, and extending to some distance from it, as explained within the assessment presented in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] . The effects on views will affect a sequence of places along the length of the line, with the effects being described in relation to each of the assessment units; in this case VRAs. Again, the views of the Project will not be experienced as a whole, but the effects on visual amenity can be understood from the LVIA, by looking at all of its component parts

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			including both the VRA and viewpoint assessments, each of which is set out in detail. It is noted that overall, these effects will be significant, as would be expected for any project of this size and nature.
12.75	Colchester City Council	The overhead line will head west from the East Anglian Connection Node, through Southern part of Langham. It is noted that much of this landscape is open in this area, and thus the impacts would be particularly significant, at least moderate-major and significant adverse within 1km of the overhead line (not within 0.5km as stated by the applicant), moderate and significant adverse between 1-1.5km.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
12.76	Colchester City Council	From Boxted, the overhead line could be closely viewed from the scattered properties along Straight Road. It also cuts across the local PRoW network. Significant visual impacts could extend beyond 1km, however additional viewpoints would be required to determine this.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair. The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints.
12.78	Colchester City Council	However, at viewpoint 4.01 Boxted Airfield Memorial, which is to outside the Receptor Area D1 and to the north, the pylons to the south remain prominent on the skyline even though they re 1.2Km away. An additional viewpoint is needed, therefore, within D1 but between 1-1.5Km away from the Project so that the effects can be clearly identified as significant or not.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair. The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints.
12.80	Colchester City Council	The Western Sealing End Compound would be particularly impactful on the landscape, sitting on an exposed ridge, visible from within the Dedham Vale National Landscape boundary within Little Horkesley. An alternative location for this CSEC was previously put forward further south of the proposed	The Applicant has considered the alternative positioning of the CSE compound but does not consider this preferred for the reasons set out in paragraph 7.2.5 of 5.15 Design Development Report [APP-122] . The theoretical visibility of the western CSE compound at Great Horkesley is illustrated in 6.13.F14

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		location, which was at a lower elevation and better screened from the national landscape. Moving the compounds further south-west, potentially south of King's Farm, extending the undergrounding would be beneficial to reduce long term visual impacts on the setting of the national landscape.	Environmental Statement Figure 13.14 - ZTV of Great Horkesley Tilbury side CSE Compound [APP-250]. Paragraph 13.2.19 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229] explains that these Zones of Theoretical Visibility (ZTV) indicate the theoretical visibility of these CSE compounds would be relatively widespread within 1 km, and more intermittent beyond 1 km. The Dedham Vale National Landscape boundary and Little Horkesley are over 1 km from the CSE compound. Viewpoint 4.07: School Road / Stour Valley Path, west of Little Horkesley is approximately 1.7 km from the nearest above ground structure of the Project. The assessment of effects from Viewpoint 4.07 can be found in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231] , pdf page 17. At this distance, effects are judged to be negligible and not significant (adverse) during construction, at year 1 and also year 15 of operation.
12.81	Colchester City Council	In Visual Receptor Area D2 Little Horkesley and Wormingford we would suggest that effects on visual receptors would likely be significant (negative) between 1-2 km of the Project. however, additional viewpoint assessments and visualisations are needed to demonstrate this. We consider that the cumulative effect of multiple pylons and the lengthy overhead linear character of the project, means that the collective effects within the study area creates an overall significant adverse effect on the perception of the wider countryside for both local householders and visitors.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair. The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints. The Applicant recognises that there will be significant effects on visual receptors at locations along the length of the Project, and extending to some distance from it, as explained within the assessment presented in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The effects on views will affect a sequence of places along the length of the line, with the effects being described in relation to each of the

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			assessment units; in this case VRAs. Again, the views of the Project will not be experienced as a whole, but the effects on visual amenity can be understood from the LVIA, by looking at all of its component parts including both the VRA and viewpoint assessments, each of which is set out in detail. It is noted that overall, these effects will be significant, as would be expected for any project of this size and nature.
12.83	Colchester City Council	Within Visual Receptor Area D3 Great Horkesley, we do not accept that either construction or operational impacts would be major significant adverse only within 0.5km.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
12.85	Colchester City Council	Of concern is that there appears to be no assessment of the effects of the overhead line on the surrounding landscape character at pylon TB35 where the undergrounding finishes and transitions to pylons and overhead lines. Assessment of this element of the Project is required. Viewpoint 4.34 Crabtree Lane, north of West Bergholt nearby demonstrates the significant major adverse impact which seriously impacts the view across the valley to Fordham. The mitigation proposed hides the pylons but also completely hides the view and therefore part of the character.	The Applicant would like to clarify that TB35 is not a pylon. TB35 is one of the gantries within the Great Horkesley (Tilbury side) CSE compound, with the other gantry being TB36. The Great Horkesley (Tilbury side) CSE compound falls within LCA B5: Rochfords Farmland Plateau. The assessment of effects on this LCA is set out in paragraphs 13.3.513 to 13.3.527 of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. This includes an assessment of the CSE compound and overhead line (with the gantries in the CSE compound being TB35 and TB36 and the first pylon to the south being TB37). Within 1.5 km the effect of construction and effects at operation year 1 and operation year 15 are judged to be moderate and significant (adverse). Viewpoint 4.34 Crabtree Lane, north of West Bergholt is assessed within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231], pdf page 101.

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			As set out in 7.4 Outline Landscape and Ecological Management Plan (Revision C) illustrative landscape designs have been provided for Environmental Areas around CSE compounds. These areas will provide landscape and visual mitigation, while also offering ecological value and Biodiversity Net Gain (BNG). The purpose of the landscape mitigation proposals is set out in paragraph 9.7.23 of 7.4 Outline Landscape and Ecological Management Plan (Revision C): • To filter and screen views from the surrounding area, to reduce significant effects on visual receptors including local residents and users of the minor road and PRow networks, including within the National Landscape • To connect existing hedgerows and woodland, to improve green networks and enhance landscape character. The Project has sought to maximise the extent of habitat creation and enhancement where possible in these areas. Once detailed design of the Project has been developed the illustrative landscape designs will be updated and finalised. The Environmental Areas cover land that would be owned and managed by National Grid. The Applicant has committed to a 30-year aftercare period at the proposed Environmental Area in line with commitments made within 7.1 Biodiversity Net Gain Report [APP-299].
12.87	Colchester City Council	It is hard to judge the view of the pylons from the village of Fordham as the viewpoint 4.08, which has a close-to view and is at the heart of the village just in front of the church and the pub, is only presented as a wireline. The assertion that 'Views from within Fordham would be screened and filtered in places	Fordham and the Fordham Hall Estate (which is a Woodland Trust site) is located within VRA D5, LCA A5 Colne River Valley Slopes and LCA B5 Rochfords Farmland Plateau and is represented by Viewpoint 4.08 and Viewpoint 4.30. Major and moderate significant effects have been identified within 1.5 km in

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		by woodland blocks' is at best misleading as the vegetation in the baseline photos and visualisations of Viewpoint 4.08 Fordham are generally uncut hedgerows. Substantially unfiltered views of the overhead line would be visible from most of the Fordham Hall Estate Open Access Land with three of the pylons actually being sited on this land, therefore producing significant major adverse un-mitigatable effects.	these areas, as set out in paragraphs 13.7.52 to 13.7.63 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229] and paragraphs 13.3.513 to 13.3.558 in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. The Applicant recognises that the level of filtering or screening of views by vegetation will vary with seasons, as leaves come and go, and as a result of hedgerows growing and then being cut. Illustration with a wireline is recognised as a standard tool in LVIA. The limitations of wirelines are recognised, in that they do not use photography, show buildings or vegetation. However, they allow for an accurately scaled representation of the change to be modelled, based on a digital terrain model of the bare ground, and are a helpful tool in informing an understanding of and illustrating changes. Many detailed photomontages are provided, as well as wirelines, ZTVs and other graphical materials. This information together with the written reporting is considered sufficient and proportionate, enabling the assessor, and in turn the decision maker, to make a well-informed judgement, without the need for further photomontages. It is important to note that the LVIA is based on first hand observations during site visits and not on viewpoints and visualisations alone. The conclusions of the LVIA will not change as a result of adding new assessment or visualisations, however, if parties consider the provision of further visualisations helpful, then these could be provided.

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12.88	Colchester City Council	South of Fordham, viewpoint 4.30 shows the wide-ranging and prominent visibility of the overhead line, views that are from open access land surrounding Fordham. The overhead line would frame views looking back towards Fordham, creating an industrial feel. We do not accept that intervening woodland provides much filtering.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
12.89	Colchester City Council	Heading from Fordham towards Fordstreet, it is clear there would be major significant adverse impacts on the view in a scenic part of the valley, in what used to be the Special Landscape Area. We do not agree that significant impacts would be limited to within 1.5Km at the operational stage, as there would be wide views up and down the valley to the pylons and wide views back up to the pylons and OH line as they come down the valley slope. We consider the line should be either undergrounded or diverted from this part of the valley and that this is justified by the value and sensitivity of this distinctive landscape feature and the visual amenity it provides.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
12.91	Colchester City Council	The pylons are very prominent next to the village of Aldham looming over existing housing and creating really negative place-making. The alignment is not acceptable and needs undergrounding or setting back. Viewpoints 4.11 and 4.37 show the severity of the impact close to residential areas and surrounding PROW. We consider that the effect would be moderate and significant (adverse) between only 1.0-1.5 Km. Between approximately 1 km and 2 km, the overhead line would be visible in medium to long views and would most often be seen on the skyline and above intervening trees, with	Detailed siting and routeing is informed by the guidance available in the Holford and Horlock Rules, the results of technical and environmental studies and fieldwork and the application of the mitigation hierarchy. The Applicant notes that balanced decision-making is required to consider the different combinations of effects and consequences. The Applicant starts from the policy position set out in NPS EN-5 (2024). This is clear on the strong Government starting presumption that overhead lines in general are appropriate. The area identified by the Council is not within a nationally designated landscape and not within

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		visibility decreasing with distance as layers of vegetation and topography further screen out views. However, there are no viewpoint images to demonstrate this. Effects on visual receptors would likely be significant (negative) within approximately 1.5 km of the Project.	the setting of a Nationally designated landscape. Therefore NPS EN-1 (2024) para. 5.10.34 and the reversed assumption to use underground cables as per EN-5 2.9.20 are not engaged. The Applicant also does not consider that the tests in NPS EN-5 paragraph 2.9.23 are engaged. The Applicant notes that within VRA D7 Fordstreet and Aldham, i.e. the area which Viewpoints 4.11 and 4.37 lie within, major and significant (adverse) effects have been identified within 0.5 km at construction and operation, including from Aldham and Fordstreet. Moderate and significant (adverse) effects have been identified between 0.5 km and 1.5 km, at both construction and operation, as set out in paragraphs 13.7.76 to 13.7.87 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. As set out within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231], significant adverse effects have been identified at Viewpoint 4.11 and Viewpoint 4.37 (major and moderate-major respectively). This is in line with the VRA D7 assessment. The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair. The conclusions of the LVIA will not change as a result of adding new assessment or visualisations, however, if parties consider the provision of further wirelines helpful, then these could be provided.
12.94	Colchester City Council	From Great Tey, views of the overhead line appear to be limited, considering much of the village is in a	Viewpoint 4.22: PRoW between Great Tey and Little Tey is represented by a baseline photograph only. The

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		slight dip. However, there would be close views within 0.5km from the local roads and PRow network along scattered properties south of Great Tey and properties at East Gores. However, a visualisation from Viewpoint 4.22 PRow between Great Tey and Little Tey is needed from VP 4.22 to demonstrate the effects.	assessment of Viewpoint 4.22 is set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231] , and judges that there would be moderate and significant (adverse) effects at construction, operation year 1 and operation year 15. The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints, however, if parties consider the provision of further wirelines helpful then these could be provided.
12.109	Colchester City Council	Whilst the Environmental Statement includes many viewpoints surrounding the project alignment, it is still considered that additional viewpoints would be beneficial to adequately assess the significance of the visual impacts in certain locations. A list of these is provided below: • Within receptor area D1 (Tye Green and Boxted) but between 1-1.5km of the project. • Within receptor area D2 (Little Horkesley and Wormingford) 1-2km of the project, particularly considering view from the national landscape. • Within receptor area D3 (Great Horkesley) there is a lack of viewpoints beyond 0.5km, particularly near the Western Cable Sealing End Compound. These are required. • Within receptor area D5 (Fordham), a photomontage visualisation should be provided from viewpoint 4.08 to provide a clearer visual of the project from the centre of the village (in contrast to the wireline currently provided) • Within receptor area D6 (Fordham Heath and Eight Ash Green), the viewpoint 4.28 needs at	The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The viewpoints were discussed with relevant Local Planning Authorities, as set out in the Statements of Common Ground (5.9.1 to 5.9.12 [REP1-010 to REP1-032]). The LVIA viewpoints are a representative selection of publicly accessible locations along the Project, capturing a range of receptors and a variety of distances and viewing directions. The number of viewpoints assessed in the LVIA (206 viewpoints) is considered to be proportionate and appropriate in relation to the scale of the Project. The locations of all viewpoints are shown on 6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [REP1-066]. Baseline photographs and illustration with a wireline are recognised as standard tools in LVIA. The limitations of wirelines are recognised, in that they do not use photography, show buildings or vegetation. However, they allow for an accurately scaled representation of the change to be modelled, based on a digital terrain model of the bare ground, and are a

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		least to have a wireframe as this is taken from the Essex Way. Currently only baseline photographs from this viewpoint are shown. • Within receptor area D7 (Fordstreet and Aldham), there should be provision of viewpoints between 1-2km of the alignment • Within receptor area D10 (Copford) there are no viewpoints located, although it would be expected views would be limited due to the majority of the area being well screened.	helpful tool in informing an understanding of and illustrating changes. Many detailed photomontages are provided, as well as wirelines, ZTVs and other graphical materials. This information together with the written reporting is considered sufficient and proportionate, enabling the assessor, and in turn the decision maker, to make a well-informed judgement, without the need for further photomontages. The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints, however, if parties consider the provision of further wirelines helpful then they could be provided.
12.111	Colchester City Council	Visual effects: The ES acknowledges that the proposals will have a significant negative visual impact over the length of the Project. This is identified as up to 1.5Km from the Project line in most situations. Generally, beyond 1.5Km we accept that individual impacts will not be significant. However, as a result of open landscapes, multiple pylons in view and cumulative effects when passing from one visual receptor area to another along the line, we consider that the cumulative effect is likely to result in an overall significant adverse effect generally within the study area at both construction and operation.	The Applicant recognises that there will be significant effects on visual receptors at locations along the length of the Project, and extending to some distance from it, as explained within the assessment presented in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The effects on views will affect a sequence of places along the length of the line, with the effects being described in relation to each of the assessment units; in this case VRAs. The views of the Project will not be experienced as a whole, but the effects on visual amenity can be understood from the LVIA, by looking at all of its component parts including both the VRA and viewpoint assessments, each of which is set out in detail. It is noted that overall, these effects will be significant, as would be expected for any project of this size and nature.
12.114	Colchester City Council	The ES acknowledges that the proposals will have a significant negative landscape impact at both construction and operational stages over the length of the Project. Where negative effects are judged not to be significant further away from the Project	See the response to ID 13.148 (Suffolk County Council and Babergh District Council and Mid Suffolk District Council). The LPAs position is noted. The LVIA identifies significant effects, as acknowledged by the LPA. The

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		line, the visual character of the landscape and its perceptual nature is likely to combine to significantly negatively affect the landscape over a wide area, reducing scenic beauty and tranquillity, aesthetic enjoyment, a sense of place, history and identity, and inspiration for learning throughout the landscape and visual study area.	assessment necessarily focuses upon determining and reporting upon locations and receptors where those effects are expected to be significant. It is recognised that there will be effects resulting from the change, including to the factors listed.
12.133	Colchester City Council	We welcome the inclusion of landscape value criteria as part of the landscape value assessment methodology, as identified in Table A13.1.4 Factors contributing to landscape value, based on The Landscape Institute's Technical Guidance Note (TGN) 02/21 Assessing landscape value outside national designations (Landscape Institute, 2021). We have some concerns that this value assessment has been carried out just at a character area level rather than looking at the details of the landscape value within the Order Limits and their setting. This could result in the downplaying of specific qualities and value related to the development corridor itself, particularly of river valleys. In order to reduce significant landscape and visual impacts at the operational stage over the length of the Project, more consideration of undergrounding is required to protect valued local landscapes, notably river valleys, long-distant rights of way and rural amenity sites.	The LVIA is reported in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] . 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 GLVIA3. The approach to making judgements on the value of landscape receptors is set out in paragraph 13.4.25 to Table A13.1.4 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227] . Judgements on landscape value are reported in Annex A of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] . Value judgements were informed by the Landscape Institute's Technical Guidance Note 02/21 Assessing Landscape Value Outside National Designations. This defines landscape value as ' <i>the relative value or importance attached to different landscapes by society on account of their landscape qualities</i> ' (page 3). Consideration of river valleys falls under a range of factors (or criteria), including Natural Heritage, Distinctiveness, Perceptual (scenic) and Functional factors, and consideration of historic greens falls under the Cultural Heritage factor.

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			The assessment notes qualities and attributes of the landscape and views more locally in the written commentary, where relevant, as well as illustrating these in the accompanying visualisations. For example, river valleys and long-distance PRoW are noted, where relevant. It is considered that the level of detail that is provided in the LVIA is sufficient and proportionate, enabling the decision maker to understand the nature and level of effects. Whilst it would always be possible to add further detail, the purpose of LVIA (and EIA) is to provide a proportionate assessment.
12.134	Colchester City Council	In relation to the landscape value assessments, we have concerns that the detailed assessments identified in Annex A to Appendix 13.2: Landscape Baseline and Assessment appear to undervalue factors, particularly in relation to ‘Distinctiveness’, ‘Perceptual’ and ‘Functional’ criteria.	See the response to ID 12.133 (Colchester City Council)
12.149	Colchester City Council	Despite the scale of the project, it does not appear as though the effects of the Project on national or regional landscape character have been assessed. We question the judgement of this approach considering this is a proposal that at least of a regional scale if not national and is identified as having significant negative operational landscape and visual effects along the whole length of the approximately 184Km of new infrastructure.	As set out in Section 13.2 within 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228], descriptions of landscape character are available at national, regional and district/county scales. A description of the key characteristics of National Character Areas (NCAs) 86 and 111 is provided in Table A13.2.1 and these are shown on 6.13.F5 Environmental Statement Figure 13.5 - National Character Areas and East of England Typology [APP-241]. The assessment considers effects on district and county level LCTs and LCAs. These LCAs are at a finer grain than NCAs and so were deemed more appropriate as the basis of assessment. NCAs have been described in the landscape baseline section of 6.13.A2 Environmental Statement Appendix 13.2

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			- Landscape Baseline and Assessment [APP-228]. GLVIA3 (pg.79) states '<i>Broad-scale assessments at national or regional level can be helpful in setting the landscape context but are unlikely to be helpful on their own as the basis for LVIA - they may be too generalised to be appropriate for the particular purpose</i>'.
12.153	Colchester City Council	Our position is that at the operational stage impacts are likely to still be major significant rather than moderate significant beyond 0.5Kms.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
12.156	Colchester City Council	Even where the effects are deemed not significant, the character of the landscape is changed over a much wider area, with proposed overhead lines reducing the provision of what GLVIA3 (Page 18. Para 2.11) describes as: • Opportunities for aesthetic enjoyment • A sense of place and a sense of history which contributes to individual, local, national and European identity. • Inspiration for learning, as well as for art and other forms of creativity	See the response to ID 13.148 (Suffolk County Council and Babergh District Council and Mid Suffolk District Council).
12.161	Colchester City Council	<i>LCA B7: Langham Farmland Plateau</i> We query the Sensitivity assessment for this landscape as being Medium sensitive to this sort of infrastructure as this is an open, gently undulating landscape in which there is high intervisibility and for which 'long distance framed views' are characteristic. We consider the Sensitivity to be at least Medium – High.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.

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12.162	Colchester City Council	In relation to Construction effects, we do not agree that the effect would only be moderate and significant (adverse) within 1.5 km of the Order Limits. As we consider the landscape is at least of Medium-High Sensitivity we consider the effects would be moderate-major (adverse) at least for the first 0.5Kms. We agree the effect would be minor and not significant (adverse) beyond 1.5Kms.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
12.163	Colchester City Council	We disagree with the judgement that ' <i>...would not affect the underlying scale of the LCA due to its relatively large-scale.</i> ' In addition, the A12 is peripheral to this LCA, not central, and the other man-made infrastructure, including the solar farm, do not match the Project for height, spatial extent or visual dominance.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
12.164	Colchester City Council	In relation to the overhead line, we consider the geographical effects would be wider than 0.5Kms due to the relatively open landscape spreading visual effects wider and reducing perceptual factors of tranquillity and amenity. We agree the magnitude of effect would be high but suggest it would be up to 1.0Km of the Project Line. We agree the effect is moderate-major and significant (adverse) but suggest that this is within 1.0 km of the lateral overhead line not 0.5Km; moderate and significant (adverse) between 1.0-1.5 km and minor and not significant (adverse) elsewhere in the LCA.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
12.167	Colchester City Council	<i>A8: Stour River Valley Floor</i> We agree with the judgements of high susceptibility and value, and that overall sensitivity is judged to be high. We agree the effect of the underground sections of cable at construction would be minor and	The position of the LPA is noted. See the response to ID 12.85 (Colchester City Council).

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		not significant (adverse) reducing to negligible elsewhere in the LCA. However there appears to be no assessment of the effects of the overhead line e.g. at TB35, on the LCA just to the north-east where there is a tributary of the Stour to the east of Little Horkesley. Assessment of this element of the Project is required.	
12.172	Colchester City Council	The effect on the LCA is identified as likely to be significant (adverse) within approximately 1 km of the Project during construction. There would be a long-term direct effect, notably due to the fragmentation of tree cover along Black Brook. This would affect the key characteristic of the 'intimate tranquil, relatively steep-sided river valley which is narrow in places and has the narrow meandering Black Brook running through the floodplain' with significant (adverse) effects within approximately 1 km during operation. Due to their intimate character valley landscapes contribute considerably to a sense of place and history which would be affected strongly at a local level. From the information given it is unclear if these long-term significant effects are within the National Landscape as the character sub areas are not clearly marked on the landscape character maps. The approach needs to be rethought if it results in significant residual adverse effects on the National Landscape.	See the response to ID 12.72 (Colchester City Council).
12.173	Colchester City Council	LCA Sub Area A7c: Stour River Valley Slopes: This LCA has a sub area (A7c) which is centred on small streams and ponds to the north of Workhouse Hill, part of which is located within Dedham Vale National Landscape. Although the draft Order Limits just fall within 1 km of the Stour River Valley Slopes LCA	The position of the Local Planning Authority is noted. Cumulative effects are set out in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] and its supporting appendices. No cumulative effects have been identified within LCA Sub Area A7c. This is because there are no cumulative developments

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		sub area A7c, we agree it is unlikely that construction activity would be perceptible due to intervening landform, buildings, and layers of vegetation. We agree that there would likely be no effect on the LCA at either the construction or operational stage. However we have concerns about the cumulative effects on this part of the National Landscape overall during the construction stage.	that influence LCA Sub Area A7c (as shown on the 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]) and effects on the landscape from the Project alone are not significant and therefore are unlikely to give rise to significant cumulative effects. Significant inter-project cumulative effects have been identified on Dedham Vale National Landscape during construction as set out on pages 7 and 8 of 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284] . This is as a result of inter-project cumulative effects between the Project and the Bramford to Twinstead project during construction because construction periods are likely to overlap between 2027 and 2028.
12.178	Colchester City Council	During construction there would be disturbance to farmland and open access land (3 No pylons are due to be sited on the Access Land with the overhead line oversailing the land), and a loss of hedgerows, hedgerow trees, semi-mature and mature field trees, clumps of woodland/scrub and recently planted young woodland in open access land to the south of Fordham and riparian vegetation along the River Colne This is judged to cause a disturbance to the 'attractive and open' character of the LCA. Even though the valley sides of the Colne are quite steep at this point, we do not accept that beyond 1Km, the valley topography and layers of vegetation including woodland, riparian vegetation, hedgerows, and field boundary trees would reduce intervisibility within the wider LCA, nor reduce the significant effects, due to the height of the infrastructure, during construction and at operation.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.

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12.180	Colchester City Council	LCA A4: Colne River Valley Floor: This LCA is located along the River Colne to the west of Colchester. A narrow part of the Colne River Valley Floor LCA would be directly affected by construction activity to the east of Fordstreet. As above we judge the significant effects would be more widespread, both towards the end of the construction period and during operation, as this is an unspoiled river valley and views in and out of the valley, including from Mill Lane and along the Essex Way that follows the river for some distance, are quite widespread. This area used to be a Special Landscape Area and would likely be identified as Valued Landscape if an assessment was carried out. It is the most accessible section of unspoiled riverside landscape to the west of Colchester and used extensively by walkers. The opportunity should be explored for either realignment north and west of the Open Access Land explored or undergrounding be proposed as an alternative.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair. The Applicant notes that sequential assessments have been undertaken for long distance paths such as the Essex Way as advocated in GLVIA3 paragraph 6.22. This assessment is set out in Section 13.12 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Detailed siting and routeing is informed by the guidance available in the Holford and Horlock Rules, the results of technical and environmental studies and fieldwork and the application of the mitigation hierarchy. The Applicant notes that balanced decision-making is required to consider the different combinations of effects and consequences. The Applicant starts from the policy position set out in NPS EN-5 (2024). This is clear on the strong Government starting presumption that overhead lines in general are appropriate. The area identified by the Council is not within a nationally designated landscape and not within the setting of a Nationally designated landscape. Therefore NPS EN-1 (2024) para. 5.10.34 and the reversed assumption to use underground cables as per EN-5 2.9.20 are not engaged. The Applicant also does not consider that the tests in NPS EN-5 paragraph 2.9.23 are engaged.
12.181	Colchester City Council	LCA B4: Great Tey Farmland Plateau: The Great Tey Farmland Plateau LCA is located to the south of the River Colne and contains the settlements of	The position of the LPA is noted. The Applicant has identified significant adverse effects on LCA B4: Great Tey Farmland Plateau, up to approximately 1.5 km

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		Great Tey and Aldham The eastern part of the Great Tey Farmland Plateau LCA would be directly affected by construction The preliminary assessment identifies there would also be disturbance to the 'peaceful and tranquil' character of the LCA. The LCA would also be indirectly affected by the construction activity, which it is identified would be perceptible within approximately 1 km of the draft Order Limits. VP4.10 at Great Tey shows how, even at 1.6Km, the effects of the overhead line are significantly negative over a wide area once operational. We do not support the assertion, therefore that, significant effects only occur within 1.0Km of the Project line. An assessment and visualisation should be prepared for VP 4.15 or 4.22 where there are wide views of the proposals, or on one of the PRoW closer to the scheme between 1-1.5KM.	from the LoD, as set out in paragraphs 13.3.579 to 13.3.586 of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair. There is no Viewpoint 4.15. During earlier rounds of consultation with LPAs on viewpoints this viewpoint was relocated to the Essex Way and a photomontage was included in the ES at Viewpoint 4.24: Essex Way near Fordstreet, as shown in 7.12 Visualisations - Part 5 of 9 [APP-347]. Viewpoint 4.22: PRoW between Great Tey and Little Tey is represented by a baseline photograph only. The assessment of Viewpoint 4.22 is set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231], and judges that there would be moderate and significant (adverse) effects at construction, operation year 1 and operation year 15. The conclusions of the Landscape and Visual Impact Assessment (LVIA) will not change as a result of adding new assessment or illustrated viewpoints, however, if parties consider the provision of a further wireline for Viewpoint 4.22 helpful then this could be provided by Deadline 3.
12.182	Colchester City Council	1.14.1 LCA B2: Easthorpe Farmland Plateau: The Blackwater and Brain Valley LCA is located to the west of Colchester and contains the settlements of Marks Tey and Copford. The northern part of the Easthorpe Farmland Plateau LCA would be directly affected by construction activity, north of Marks Tey	The position of the LPA is noted. The Applicant has identified significant adverse effects on LCA B2: Easthorpe Farmland Plateau, up to approximately 1.5 km from the LoD, as set out in paragraphs 13.3.596 to 13.3.601 of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and

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		and Little Tey and running broadly parallel to the north of the A120. The effect on the LCA is judged likely to be significant (negative) within approximately 1 km of the draft Order Limits. However, VP 4.12 which views the Project from 1.2Km shows that the effects are still significant. Therefore, we cannot agree that once operational the effect on the LCA would only likely be significant (negative) within approximately 1 km of the Project.	Assessment [APP-228] . The Applicant agrees that effects at Viewpoint 4.12: A120 Coggeshall Road, Marks Tey would be significant, as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231] . The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
12.186	Colchester City Council	We welcome the 206 Viewpoint assessments that have been identified over the whole project length which is a considerable increase on the number presented in the PEIR, but note that there are still considerable gaps in the provision including in VRA C12 Ardleigh (Longer distance), VRA D3 Great Horkesley and Horkesley Heath (Longer distance) VR10 D10 Copford VRA E3 Kelvedon. The shortfall is particularly noticeable from beyond 1.5 Kms and is in danger of undervaluing the significance of the effects on the PRoW network in particular.	See the response to ID 4.10.23 (Essex County Council)
12.188	Colchester City Council	We consider that the visual assessment should more explicitly extend into sensitive areas beyond the 3Km line including the National Landscape in order to demonstrate the effects are not significant.	See the responses to ID 4.10.25, ID 4.10.26 and ID 4.10.27 (Essex County Council)
12.189	Colchester City Council	Figure 13.15 - Landscape and Visual -ZTV of Fairstead (EACN Side) and Fairstead (Tilbury Side) CSE Compounds shows that theoretical visibility of the whole structure of the substation is extensive and goes beyond the 3 Km study area in several places. We consider that the visual assessment should more explicitly extend into sensitive areas	See the responses to ID 4.10.25, ID 4.10.26 and ID 4.10.27 (Essex County Council)

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		beyond the 3Km line in order to demonstrate the effects are not significant.	
12.190	Colchester City Council	Figure 13.9 - Landscape and Visual - ZTV of Proposed 400kV Overhead Line (proportions of structures visible) indicates relatively widespread theoretical visibility of the whole pylon structure and overhead line both within the 3 km study area and beyond 5Km, including from villages, the PRoW network, National Cycle Network routes in this area, from the rural lanes and road network. This highlights how widespread the potential significant negative landscape and visual effects of the scheme are and also suggests that some visual assessment needs to extend beyond the 3Km study area.	See the responses to ID 4.10.25, ID 4.10.26 and ID 4.10.27 (Essex County Council)
12.191	Colchester City Council	We consider that the visual assessment should more explicitly extend into sensitive areas beyond the 3Km line in order to demonstrate the effects are not significant.	See the responses to ID 4.10.25, ID 4.10.26 and ID 4.10.27 (Essex County Council)
12.199	Colchester City Council	<i>VRAs C11 Langham (Section C) and Area D (in Colchester)</i> <i>C11 Langham (Section C)</i> We agree that within 0.5 km the scale of change would be large, the magnitude of effect would be high and the effect would be major and significant (adverse). Viewpoint 3.31 Ardleigh Heath at 0.49Km illustrates the scale and extent of the effect and its major significant adverse impact. However, we disagree that between 0.5 km and 1.5 km the scale of change would be medium and the effect only moderate and significant (adverse). Whilst Viewpoint 4.01 Boxted Airfield Memorial, Park Lane visualisation from 1.16Km does demonstrate a	Within VRA C11 Langham effects on visual receptors are judged to be significant during construction and operation within approximately 1.5 km of the LoD, as set out in paragraph 13.6.122 to 13.6.137 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229] . Major and significant (adverse) effects have been identified within 0.5 km at construction. Effects at operation at this distance have been assessed as minor and not significant (adverse) along the proposed underground cable alignment, rising to major and significant (adverse) along the proposed overhead line. Between 0.5 km and 1 km effects at construction and operation are assessed as moderate and significant

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		moderate significant adverse impact, up to 1Km we judge the effects would still be major adverse. Whilst we agree that generally, beyond 1.5 km the scale of change would be small and effect would be minor and not significant partly due to intervening vegetation, Viewpoint 4.16 Langham Playing Field off School Road, Langham from 1.71Km indicates there are still effects, which we would suggest, in open sections of the landscape would be more significant.	(adverse). Effects beyond 1.5 km are assessed as minor and not significant (adverse). Within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231], VP 4.01 (1.16 km distance) is assessed as moderate and significant (adverse) at both construction and operation. VP4.16 (1.71 km distance) is assessed as minor and not significant (adverse) at both construction and operation. This is in line with the VRA C11 assessment. VP 3.31 (1.49 km distance) is assessed as moderate-major at construction and operation within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230]. The Applicant acknowledges this differs from the effects identified within 0.5 km of the VRA assessment. The extent of identified visual effects is defined using both location specific placenames, and estimated distances across which visual effects would be experienced. All stated distances in the assessment are approximate. It is important to note that there would be a gradual transition in terms of levels of effect, rather than an absolute and abrupt change. Viewpoints are not always an exact proxy for visual effects across the VRA as a whole. In 8.1 Errata List [REP1-071], additional text is included to explain the transitional nature of effects. The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
12.203	Colchester City Council	<i>VRA D1 Tye Green and Boxted</i>	The position of the LPA is noted. Within VRA D1 Tye Green and Boxted, the LVIA identifies significant

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		At operation, within approximately 0.5 km it is identified that there would be close views of the overhead line and a CSE compound from scattered properties, including properties along Straight Road, the local PRoW network NCN Route 1 and people travelling along the A143 and local road networks Pylons would remain prominent in the view. Between approximately 0.5 km and 1 km, there would be close to medium views of the Project from scattered properties and the local PRoW and road network. Between approximately 1 km and 2 km, it is stated that views of the Project would likely be filtered and screened by layers of vegetation including woodlands and hedgerows resulting in intermittent medium to long distance views from scattered properties, a number of local PRoW, the Essex Way and roads. However, at VP 4.01 Boxted Airfield Memorial, which is to outside the Receptor Area D1 and to the north, the pylons to the south remain prominent on the skyline even though they are 1.2Km away. An additional viewpoint is needed, therefore, within D1 but between 1-1.5Km away from the Project so that the effects can be clearly identified as significant or not.	effects within approximately 0.5 km of the Project during operation, as set out in paragraphs 13.7.1 to 13.7.12 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The LVIA notes that from close to medium views <i>'the Project would be filtered and screened by intervening layers of vegetation, but when visible would be seen against the skyline'</i>. The assessment for the VRA also notes that views to the Project from around Workhouse Hill <i>'would be screened due to the dip in topography in this location, and woodland'</i>. VP 4.36 Green Lane / Essex Way, which is within VRA D1, is approximately 1.5 km from the Project and is assessed as minor and not significant, at construction and operation, within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231]. This is largely due to the extent of intervening vegetation, and backclothing provided by more distant woodland. VP 4.01 Boxted Airfield Memorial (within the adjacent VRA C11 Langham) is assessed as moderate and significant (adverse) at construction and operation within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231]. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair. The conclusions of the Landscape and Visual Impact Assessment (LVIA) will not change as a result of adding new assessment or illustrated viewpoints,

ID	Stakeholder	Comment	NG response
			however, if parties consider the provision of further wirelines helpful then these could be provided.
12.206	Colchester City Council	<i>D2 Little Horkesley and Wormingford</i> We agree that within 0.5 km of the project line, the scale of change would be large, the magnitude of effect would be high, and the effect would be major and significant (adverse). Viewpoint 4.27 B1508 Colchester Road, near Grove Lodge 0.12Km demonstrates the major significant adverse effect of the pylons close to. We welcome this additional viewpoint. However, we disagree that major effects are limited to below 0.5KM and that between 0.5 km and 1.5 km the scale of change would necessarily be medium and the effect only moderate and significant (adverse).	The Applicant notes that within VRA D2 Little Horkesley and Wormingford, which Viewpoint 4.27 lies within, major and significant (adverse) effects have been identified within 0.5 km and moderate and significant (adverse) effect have been identified between 0.5 km and 1.5 km, as set out in paragraphs 13.7.13 to 13.7.24 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The assessment of effects on Viewpoint 4.27 is included within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231]. Effects at this viewpoint have been assessed as major and significant (adverse) at construction and operation. This is in line with effects identified on VRA D2. The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
12.207	Colchester City Council	Whilst we agree that from Viewpoint 4.04 PRoW off Holt's Road, east of Wormingford (Little Horkesley 18) from 0.76Km, the visualisation does demonstrate a moderate significant adverse impact, we hold that in a more open landscape we consider the effects could remain major adverse up to 1Km. Similar receptors between 0.5Km-1Km, particularly receptors on linear features such as PRoW, would be affected by close to medium distance views of this construction activity and by the operational Project. Between approximately 1 km and 2 km intermittent medium to long distance views of	The Applicant notes that within VRA D2 Little Horkesley and Wormingford, which Viewpoint 4.04 lies within, moderate and significant (adverse) effects have been identified between 0.5 km and 1.5 km at construction. At operation, effects on VRA D2 are assessed as moderate and significant (adverse) in the west, reducing to negligible and not significant in the east, including within the National Landscape. Beyond 1.5 km, effects are assessed as negligible and not significant, increasing to minor and not significant (adverse) from the B1508 and Little Horkesley Road at Wormingford, on the edge of the National Landscape.

ID	Stakeholder	Comment	NG response
		construction activity and the completed overhead line would be seen, including from the National Landscape and the Stour Valley Path.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
12.208	Colchester City Council	<i>D2 Little Horkesley and Wormingford</i> Whilst we agree that generally, beyond 1.5 km, the effects would be minor and not significant (adverse), partly due to intervening vegetation, the visualisation from Viewpoint 4.13 B1508 Main Road, Wormingford at 1.90Km on the edge of Dedham Vale National Landscape, shows moderate adverse significant effects would still occur because of the elevation. This will generate a long-term impact on the setting of the National Landscape if it goes ahead. We would argue that further undergrounding is needed and that the CSE compound needs to be moved further south-west, potentially south of King's Farm.	The assessment of effects on Viewpoint 4.13 is included within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231]. Effects at this viewpoint have been assessed as Minor and not significant (adverse) at construction and operation. The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair. The Applicant has provided a response to the request for additional undergrounding and movement of the CSE compound in relation to paragraph 12.80 of the Colchester City Council LIR above.
12.209	Colchester City Council	<i>D2 Little Horkesley and Wormingford</i> We would suggest that effects on visual receptors would likely be significant (negative) between 1-2 km of the Project. however, additional viewpoint assessments and visualisations are needed to demonstrate this. We consider that the cumulative effect of multiple pylons and the lengthy overhead linear character of the project, means that the collective effects within the study area creates an overall significant adverse effect on the perception of the wider countryside for both local householders and visitors.	The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints. The Applicant recognises that there will be significant effects on visual receptors at locations along the length of the Project, and extending to some distance from it, as explained within the assessment presented in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The effects on views will affect a sequence of places along the length of the line, with the effects being described in relation to each of the assessment units; in this case VRAs. Again, the views of the Project will not be experienced as a whole, but the effects on visual amenity can be understood from the LVIA, by looking at all of its component parts including both the VRA and viewpoint assessments,

ID	Stakeholder	Comment	NG response
			each of which is set out in detail. It is noted that overall, these effects will be significant, as would be expected for any project of this size and nature.
12.213	Colchester City Council	<i>D3 Great Horkesley</i> Once operational, Viewpoint 4.03 Essex Way 0.42Km demonstrates the major significant adverse effect of the CSE at completion but also that the mitigation does reduce the significant effects at Year 15. We welcome the additional viewpoint assessments from VP 4.17 and VP 4.19 that give a more accurate understanding of negative effects close to. It is disappointing that Viewpoint 4.17 Lodge Lane, Colchester NCN Route 1 / Langham Lane, north of Colchester 0.38Km from the project line, is only presented as a wireline especially as it represents NCN Route 1. The effects are large, widespread and major adverse significant. We don't accept that either construction or operational impacts would be major significant adverse only within 0.5KM.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair. Illustration with a wireline is recognised as a standard tool in LVIA. The limitations of wirelines are recognised, in that they do not use photography, show buildings or vegetation. However, they allow for an accurately scaled representation of the change to be modelled, based on a digital terrain model of the bare ground, and are a helpful tool in informing an understanding of and illustrating changes. Many detailed photomontages are provided, as well as wirelines, ZTVs and other graphical materials. This information together with the written reporting is considered sufficient and proportionate, enabling the assessor, and in turn the decision maker, to make a well-informed judgement, without the need for further photomontages. The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints, however, if parties consider the provision of a visualisation helpful then this could be provided.
12.215	Colchester City Council	<i>D3 Great Horkesley</i> There is a complete lack of viewpoints from beyond 0.5Km therefore we do not accept that effects are not major significant adverse up to 1Km nor that effects are not significant moderate adverse beyond 1.5Km.	The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The viewpoints were discussed with Colchester City Council, as set out in 5.9.8 Draft Statement of Common Ground - Colchester City Council [REP1-024]. The LVIA viewpoints are a representative

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			selection of publicly accessible locations along the Project, capturing a range of receptors and a variety of distances and viewing directions. The locations of all viewpoints are shown on 6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [REP1-066]. This includes viewpoints beyond 0.5 km within Colchester district, including (approximate distance in brackets): VP4.01 (1.2 km), VP4.04 (0.8 km), VP4.05 (0.9 km), VP4.07 (1.7 km), VP4.09 (0.8 km), VP4.10 (1.6 km), VP4.12 (1.2 km), VP4.13 (1.9 km), VP4.16 (1.7 km), VP4.20 (0.6 km), VP4.22 (1.1 km), VP4.28 (1 km), VP4.29 (1.7 km), VP4.31 (1 km), VP4.32 (0.6 km), VP4.33 (1.1 km), VP4.35 (2.2 km), VP4.36 (1.6 km) and VP4.38 (1.8 km). The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints.
12.217	Colchester City Council	D4 North Colchester This Visual Receptor Area is located to the south of the Project and south of the A12, broadly encompassing the northern urban edge of Colchester. There are no representative viewpoints within this Visual Receptor Area which we don't think is acceptable. There would be no construction activity within the Visual Receptor Area.	GLVIA3 advocates a proportionate approach to identifying viewpoints, stating that '<i>The emphasis must always be on proportionality in relation to the scale and nature of the development proposal and its likely significant effects, and on agreement with the competent authority and consultation bodies</i>' (GLVIA3, paragraph 6.21). The number of viewpoints assessed in the LVIA (206) is considered to be proportionate and appropriate in relation to the scale of the Project. In addition, there are a further 47 viewpoints and accompanying visualisations that support the historic environment assessment. During consultation, a number of viewpoints were requested by Local Planning Authorities. Some of these were not included in the assessment; this was due to either a lack of potential visibility of the Project (due to screening or filtering of views by landform,

ID	Stakeholder	Comment	NG response
			buildings or vegetation), or the area in question being represented by an alternative viewpoint(s). The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints, however, if parties consider the provision of additional wirelines helpful, then they could be provided.
12.218	Colchester City Council	<i>D4 North Colchester</i> We accept that effects on visual receptors would likely be negative but not significant during the construction phase and the operational phase but suggest a viewpoint is needed from e.g., the edge of the Receptor Area from National Cycle Network as it passes along Severall's Lane crossing over the A12 to demonstrate this. This is c 1Km from the Project line and it is known from elsewhere in the Project area that significant effects can be perceived at 1 Km.	GLVIA3 advocates a proportionate approach to identifying viewpoints, stating that '<i>The emphasis must always be on proportionality in relation to the scale and nature of the development proposal and its likely significant effects, and on agreement with the competent authority and consultation bodies</i>' (GLVIA3, paragraph 6.21). The number of viewpoints assessed in the LVIA (206) is considered to be proportionate and appropriate in relation to the scale of the Project. In addition, there are a further 47 viewpoints and accompanying visualisations that support the historic environment assessment. During consultation, a number of viewpoints were requested by Local Planning Authorities. Some of these were not included in the assessment; this was due to either a lack of potential visibility of the Project (due to screening or filtering of views by landform, buildings or vegetation), or the area in question being represented by an alternative viewpoint(s). The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints, however, if parties consider the provision of additional wirelines helpful, then they could be provided.
12.225	Colchester City Council	<i>D5 Fordham</i> Viewpoint 4.24 Essex Way near Fordstreet 0.48Km This VP is sited in the bottom of the Colne Valley in	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and

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		what used to be the Special Landscape Area. It demonstrates the major significant adverse effects that would occur across the valley. We consider the line should be either undergrounded or diverted from this part of the valley and that this is justified by the value and sensitivity of this distinctive landscape feature and the visual amenity it provides. There would be wide views up and down the valley to the pylons and wide views back up to the pylons and OH line as they come down the valley slope. We do not agree that significant impacts would be limited to <1.5Km at the operational stage.	remains comfortable that the matters raised have been considered and that the assessment is fair.
12.227	Colchester City Council	<i>D5 Fordham</i> We do not accept that major adverse significant effects only occur within 0.5 km. We consider they extend to at least 1km due to the prominent location of much of the infrastructure. We agree the effects would be major and significant (adverse) but suggest this would be over a much wider area causing irrevocable degradation to the visual amenity of the Colne Valley and its surroundings.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
12.230	Colchester City Council	<i>D6 Fordham Heath and Eight Ash Green</i> The additional viewpoints are to be welcomed. Viewpoint 4.28 Essex Way near Poole's Farm needs at least to have a wireframe as this VP is taken from the Essex Way.	Viewpoint 4.22: Essex Way near Poole's Farm is represented by a baseline photograph only, as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231] . The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints, however, if parties consider the provision of a wireline helpful then this could be provided.
12.232	Colchester City Council	<i>D6 Fordham Heath and Eight Ash Green</i>	The Applicant has identified significant effects on visual receptors up to a distance of approximately 1.5 km

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		There are still significant views greater than 0.5 km as evidenced by Viewpoint 4.05 PRoW near Hillhouse Wood, (West Bergholt 5) 0.9Km, Viewpoint 4.20 PRoW near Bullbanks Farm, (Aldham 4) 0.59KM Viewpoint 4.28 Essex Way near Poole's Farm 0.98Km. VP4.05, 4.20 and 4.28 are greater than 0.5Km from the Project line, therefore, we dispute that significant effects would not be found at greater distances than 1Km.	from the Project within VRAs, and extending up to 2 km from some more elevated viewpoints. The Applicant agrees that significant effects would be experienced at Viewpoints 4.05 and 4.20. At Viewpoint 4.28, effects are judged to be minor-moderate and not significant.
12.234	Colchester City Council	<i>D6 Fordham Heath and Eight Ash Green</i> We consider the scale of change would be large and the effect would be major and significant (adverse) up to 1Km and not 0.5Km as stated, due to the frequent open views and elevated pylon runs. We consider the scale of change would be medium and the effect would be moderate and significant (adverse) between 1.0 km and up to 2.0 km. Beyond 1.5 km, whilst the scale of change would be smaller, and the individual effects could be minor and not significant (adverse), we consider that the cumulative effect of multiple pylons and the continuous overhead linear character of the project, means that the collective effects creates an overall significant adverse effect within the VRA at both construction and operation.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair. The Applicant recognises that there will be significant effects on visual receptors at locations along the length of the Project, and extending to some distance from it, as explained within the assessment presented in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The effects on views will affect a sequence of places along the length of the line, with the effects being described in relation to each of the assessment units; in this case VRAs. Again, the views of the Project will not be experienced as a whole, but the effects on visual amenity can be understood from the LVIA, by looking at all of its component parts including both the VRA and viewpoint assessments, each of which is set out in detail. It is noted that overall, these effects will be significant, as would be expected for any project of this size and nature.
12.237	Colchester City Council	<i>D7 Fordstreet and Aldham</i> The proposed overhead line is likely to be seen on the skyline and would be prominent in views, particularly from Fordstreet and Aldham where there	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.

ID	Stakeholder	Comment	NG response
		are some open views to the east in neighbouring VRA D5. There would also be close views from parts of the Essex Way and open access land within the Colne Valley. The Project would be introduced into a landscape otherwise absent of overhead lines. We consider the scale of change would be large and the effect would be major and significant (adverse) within 1.0Km of the project not 0.5Km due to the openness and elevation. Viewpoint 4.31 Rectory Road near Hoe Farm, east of Great Tey 0.95KM demonstrates how major effects persist beyond 0.5Kms.	At Viewpoint 4.31: Rectory Road near Hoe Farm, east of Great Tey a moderate and significant (adverse) effect is identified, as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231] .
12.242	Colchester City Council	<i>D8 Great Tey</i> The Project would be introduced into unspoiled rural landscapes. We consider that the scale of change would be large, and the effect would be major and significant (adverse) up to 1KM (not 0.5Km) from the project line.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
12.243	Colchester City Council	<i>D8 Great Tey</i> Between approximately 1 km and 2 km, the overhead line would most often be seen on the skyline in medium to long views and above intervening trees, with visibility decreasing with distance as layers of vegetation further screen out views and as much of Great Tey is in a slight dip, views towards the Project would be limited in places as demonstrated in Viewpoint 4.10 Moor Road, Great Tey. (1.59Km) and Viewpoint 4.22 PRoW between Great Tey and Little Tey 1.08Km. A visualisation is needed from VP 4.22 to demonstrate the effects.	Viewpoint 4.22: PRoW between Great Tey and Little Tey is represented by a baseline photograph only. The assessment of Viewpoint 4.22 is set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231] , and judges that there would be moderate and significant (adverse) effects at construction, operation year 1 and operation year 15. The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints, however, if parties consider the provision of further wirelines helpful then these could be provided.

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12.244	Colchester City Council	<i>D8 Great Tey</i> We consider it is between 1.0 km (not 0.5Km) and 1.5 km that the scale of change would be medium, and the effect would be moderate and significant (adverse), reducing to minor and not significant (adverse) within the Roman River valley. Beyond approximately 1.5 km, it is less likely that effects would be significant due to a reduction in perceptibility of the overhead line which would increase with distance. However, we consider that the cumulative effect of multiple pylons and the continuous overhead linear character of the project, means that the collective effects create an overall significant adverse effect within the VRA at both construction and operation.	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair. The Applicant recognises that there will be significant effects on visual receptors at locations along the length of the Project, and extending to some distance from it, as explained within the assessment presented in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The effects on views will affect a sequence of places along the length of the line, with the effects being described in relation to each of the assessment units; in this case VRAs. Again, the views of the Project will not be experienced as a whole, but the effects on visual amenity can be understood from the LVIA, by looking at all of its component parts including both the VRA and viewpoint assessments, each of which is set out in detail. It is noted that overall, these effects will be significant, as would be expected for any project of this size and nature.
7.5.1	Braintree District Council	The report references the latest Landscape Institute guidance to assess landscape value (Technical Guidance Note 02/21: Assessing Landscape Value Outside National Designations). However, it is not clear how this has been used to inform the assessments of landscape value. The technical guidance note outlines a series of suggested factors that should be examined to form a comprehensive understanding of landscape value. Whilst some of these factors are briefly touched upon within a wider discussion of landscape value for each receptor, the consideration of landscape value is not thorough.	The approach to making judgements on the value of landscape receptors is set out in paragraph 13.4.25 to Table A13.1.4 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]. Value judgements were informed by the Landscape Institute's Technical Guidance Note (TGN) 02/21 Assessing Landscape Value Outside National Designations. This defines landscape value as '<i>the relative value or importance attached to different landscapes by society on account of their landscape qualities</i>' (page 3). Criteria for assessing landscape value are set out in Table A13.1.4 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227].

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			The following criteria (or factors) are considered when making judgements of landscape value: • Natural heritage • Cultural heritage • Landscape condition • Associations • Distinctiveness • Recreational • Perceptual (scenic) • Perceptual (tranquillity) • Functional value. Judgements on landscape value are clearly presented in Tables A1 to A55 within Annex A Landscape Value Assessment of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. The Applicant is confident the assessment of landscape value is based on a robust and consistent approach, with clear transparent criteria and assessment grades, in line with the Landscape Institute's TGN 02/21 Assessing Landscape Value Outside National Designations.
7.5.3	Braintree District Council	Whilst the summative value ratings provided for individual landscape receptors are agreed, it would have been useful to understand more of the justification for each judgement.	The Applicant notes that Braintree District Council agree with the landscape value ratings set out in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. The Applicant confirms that justification for these judgements is presented in Annex A Landscape Value Assessment of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] as described in the response to Braintree District Council ID 7.5.1.

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7.8.2	Braintree District Council	Considering the generic grouping and limited accompanying justification of value and susceptibility, the visual baseline is not particularly insightful and offers limited use.	The assessment describes the value of views within VRAs with reference to Table A13.1.9 on page 25 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]. Views within a VRA are not all equal in terms of their quality and the way they are valued by the various people which experience them. Some locations, such as promoted viewpoints, may be particularly highly valued, whereas others, even in designated areas, will be more ordinary or everyday views. Judgements made at representative viewpoints and also considering desktop study and observations made on site are used as a proxy from which to understand the value of views within the VRAs across the Study Area, given it would not be possible to judge the value of every view from every part of the Study Area. The use of representative viewpoints to do this is advocated in the guidance and widely accepted as good practice.
7.10.4-5 & 7.12.2	Braintree District Council	Any re-positioning of the pylons from the positions shown within the submitted plans could have a greater effect on these and other visual receptors, with seemingly little safeguards to prevent or other mitigate any additional harm of/to those visual receptors. Overall, the scheme could potentially appear “unpleasantly encroaching” and “inescapably dominant” from both properties. These are two of the criteria within the Residential Visual Amenity Assessment (RVAA) methodology that could lead to visual amenity being breached. The Council consider that this needs to be reviewed again (the impact on E7 and E8) and should form part of the site visit route at examination.	6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] (RVAA) has been undertaken as part of the Environmental Statement (ES) that accompanies the development consent application. The RVAA [APP-233 and APP-234] was prepared in line with the Landscape Institute’s Technical Guidance Note 2/19 Residential Visual Amenity Assessment. Worst-case scenarios, whereby a proposed pylon and/or overhead line could be re-positioned to a location within the LoD where they would have the greatest visual impact upon that property (which predominantly, but not always, would be the closest point to the property) have been considered in the RVAA.

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		The development would also result in residential visual amenity impacts, particularly at E7 West Ford Farm Cottage and E8 Whiteheads Farm. The Council considers that the flexibility introduced by the limits of deviation undermines confidence that the worst-case impacts on these receptors have been fully captured, and that actual effects could be materially greater than those presented.	With regards to property E7 – West Ford Farm Cottage, the worst-case scenario would be the movement of pylon TB93 (currently proposed along the ‘centreline of work’ approximately 152 m from the property’s garden and 157 m from its dwelling) to the closest point of the LoD from the dwelling (as shown on 2.3 Works Plans - Section E [APP-021]). This would make the pylon, instead, approximately 65 m from the property’s garden and 60 m from its dwelling (but, importantly, not ‘adjacent’ to the residential boundary as is stated in Braintree Borough Council’s Relevant Representation). In this worst-case scenario the Project would be appear closer (so larger) in the views experienced from the property, and the pylon would still be located within the field to the property’s immediate north, but there would not be any additional impacts. Additionally, the property’s northern boundary hedge and trees would still filter some views from the dwelling’s ground floor windows and the garden’s main patio area to the pylon. Therefore, the Project would: not block the only available view from the property, not be overwhelming in views in all directions from the property, not be unpleasantly encroaching, and not be inescapably dominant in views from the property (as set out in the tests in paragraph 13.2.26 of the RVAA). Consequently, in both the proposed and in this worst-case scenario, the Project would not have such an overbearing and dominant impact on West Ford Farm Cottage that would give rise to the ‘residential visual amenity threshold’ being breached. With regards to property E8 – Whiteheads Farm, the worst-case scenario would be the movement of pylon TB98 (currently proposed along the ‘centreline of work’ approximately 126 m from the property’s garden and 158 m from its dwelling) to the closest point of the LoD

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			from the dwelling (as shown on 2.3 Works Plans - Section E [APP-021]). This would make the pylon, instead, approximately 75 m from the property's garden and 100 m from its dwelling (but, importantly, not 'adjacent' to the residential boundary as is stated in Braintree Borough Council's Relevant Representation). In this worst-case scenario the Project would appear closer (so larger) in the views experienced from the property, but there would not be any additional impacts. Additionally, the evergreen hedgerows along the property's north-east facing boundary would still filter some views from the dwelling's ground floor windows and the garden to the pylon. Therefore, the Project would: not block the only available view from the property, not be overwhelming in views in all directions from the property, not be unpleasantly encroaching, and not be inescapably dominant in views from the property (as set out in the tests in paragraph 13.2.26 of the RVAA). Consequently, in both the proposed and in this worst-case scenario, the Project would not have such an overbearing and dominant impact on Whiteheads Farm that would give rise to the 'residential visual amenity threshold' being breached. The final position of the pylons is yet to be confirmed, but it should be noted that in reality, they would not be located all the way to the edge of the LoD of the Order Limits due to conductor swing.
7.11.4	Braintree District Council	In terms of the Outline Landscape Ecological Management Plan (OLEMP), in respect to Landscaping, the document is considered to be generic and provides minimal site-specific management information. While a detailed LEMP would follow through requirement, it is imperative that the OLEMP is sufficiently detailed at this stage.	The Applicant confirms that the final version of the Landscape and Ecological Management Plan (LEMP) and Code of Construction Practice (CoCP) will be submitted for approval to the relevant Local Planning Authorities, in accordance with Requirement 4 of 3.1 Draft Development Consent Order [APP-056], prior to commencement of works. It will include additional

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		The Council would likely support other Host Authorities view of this document in terms of improving it.	details as the detailed design and construction programme are finalised and confirmed.
18.2.8 and 18.12.11	Braintree District Council	Residential visual amenity impacts at specific properties that may be understated, particularly when Limits of Deviation are applied. Risk that actual impacts on residential amenity would be materially worse than those assessed.	Worst-case scenarios, whereby a proposed pylon and/or overhead line could be re-positioned to a location within the LoD where they would have the greatest visual impact upon that property (which predominantly, but not always, would be the closest point to the property) have been considered in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] . The final position of the pylons is yet to be confirmed, but it should be noted that in reality, they would not be located all the way to the edge of the LoD of the Order Limits due to conductor swing.
8.333 and 8.334	Chelmsford City Council	<i>LCA C5: Chelmer Valley:</i> It is agreed that the Project would result in Direct effects arising during construction which would include the removal of some landscape features including the disturbance to farmland (mainly arable fields) and riparian habitat associated with the River Chelmer, and the loss of some field boundary hedgerows, field trees, and hedgerow trees. These all form key characteristics of the LCA. Features such as hedgerows, riparian vegetation and hedgerow trees are present throughout the landscape and are well connected linear features. Fragmentation of these features potentially have significant impact in the wider LCA. Generally, the individual judgements made for within 0.5km, between 0.5-1.5 km and beyond 1.5 km	The Applicant acknowledges this typographical error which has been reflected on page 21 of 8.1 Errata List [REP1-071] as below: The Errata changes Paragraph 13.3.707 from ‘ <i>The magnitude of the landscape change would be high within 1.5 km of the Order Limits, and low elsewhere.</i> ’ to ‘ <i>The magnitude of landscape change would be high within 0.5 km of the Order Limits, medium between 0.5 km and 1.5 km, and low elsewhere.</i> ’

ID	Stakeholder	Comment	NG response
		which confirm no reduction in effects from construction are agreed with. The judgements in Table A13.2.52 (construction and operational) are agreed with. Yet we query the magnitude at 0.5-1.5km (construction) which has been judged to be medium in the table but high in para 13.3.707.	
8.53 8.337 8.362 8.369 8.378 8.392 8.397 8.402 8.408 8.416 8.425 8.435 11.38	Chelmsford City Council	<i>'... the cumulative effect of multiple pylons and the continuous overhead linear character of the Project, mean that the collective effects create an overall significant adverse effect ... at both construction and operation. '</i>	It is assumed the comment relating to 'cumulative effect of multiple pylons and the continuous overhead linear character of the Project' is made in relation to the way the Project is itself experienced in the Study Area. Existing overhead lines are considered as part of the landscape and visual baseline, against which the effects of the Project are assessed as set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The Applicant recognises that there will be significant effects on landscape and visual receptors at locations along the length of the Project, and extending to some distance from it, as explained within the assessment presented in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The effects on landscape character and visual receptors will affect a sequence of places and people along the length of the line, with the effects being described in relation to each of the assessment units (LCTs and VRAs). Effects will not typically be experienced as a whole, but the total effect on landscape character and visual receptors can be understood from the LVIA, by looking at all of its component parts, each of which is set out in detail. It is noted that overall, these effects will be significant, as would be expected for any project of this size and nature.

ID	Stakeholder	Comment	NG response
			Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the LVIA Study Area, as illustrated on 6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240]. Whilst the rural landscape will remain in place beneath and around the proposed overhead line, it is nevertheless recognised by the Applicant that significant effects on landscape character and visual amenity will occur. These effects are reported in the LVIA in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].
8.312	Chelmsford City Council	The landscape value assessment was not made available until the submission of the ES and so has not, to our knowledge, informed the alignment in any meaningful way. It is considered the proposed alignment needs to be looked at again in light of this data.	Detailed siting and routeing is informed by the guidance available in the Holford and Horlock Rules, the results of technical and environmental studies and fieldwork and the application of the mitigation hierarchy. The Applicant notes that balanced decision-making is required to consider the different combinations of effects and consequences. The Landscape and Visual Impact Assessment (LVIA) set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] identifies significant adverse residual effects on landscape receptors along the length of the Project, up to approximately 1.5 km from the Project. The approach to the assessment of effects on the landscape follows professional guidance as set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]. Where there are no current local landscape designations such as Special Landscape Areas within

ID	Stakeholder	Comment	NG response
			the Study Area, the value of the landscape has been considered and a consistent approach to making judgements on the value of landscape receptors is set out in paragraph 13.4.25 to Table A13.1.4 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]. Judgements on landscape value are reported in Annex A Landscape Value Assessment of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. Value judgements were informed by the Landscape Institute's Technical Guidance Note (TGN) 02/21 Assessing Landscape Value Outside National Designations. This defines landscape value as '<i>the relative value or importance attached to different landscapes by society on account of their landscape qualities</i>' (page 3).
8.355 – 8.361	Chelmsford City Council	<i>F1 Great Leighs:</i> The Visual Receptor Area is located towards the south of the Project, southwest of Braintree. It lies broadly between the southern edge of Great Notley and Chatham Green. The representative viewpoints are: • Viewpoint 6.01 Castle Close, Great Leighs • Viewpoint 6.03 Essex Way, Chatham Green • Viewpoint 6.25 PRoW, east of Littley Green (Great Waltham 54) It is agreed that the Project would be visible in close views from the south-east of the VRA, including Pork Hall Lane and Boreham Road (Protected	The assessment of visual effects on VRA F1 is presented in paragraphs 19.9.1 to 13.9.12 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Effects are assessed as follows: Within 0.5 km the scale of change would be large and the magnitude of effect would be high. The effect would be major and significant (adverse). Between 0.5 km and 1.5 km the scale of change would be medium and the magnitude of effect would be medium. The effect would be moderate and significant (adverse). Beyond 1.5 km the scale of change would be small and the magnitude of effect would be low. The effect would be minor and not significant (adverse).

ID	Stakeholder	Comment	NG response
		Lanes) (which would both be crossed by the Project), NCN Route 50 and PRow. The Project would be seen above wooded skylines and in relatively open views. Views from the local road network would be partially filtered by intervening vegetation but would be seen through gaps in the vegetation, and as large scale features above wooded skylines. The Project would be introduced into views largely absent of overhead lines. It is considered the scale of change would be large and the effect major and significant (adverse) within 1.0km not 0.5Km. Viewpoint 6.01: Castle Close, Great Leighs 0.91Km and Viewpoint 6.03: Essex Way, Chatham Green 0.80Km demonstrate how even at this distance, the overhead line is prominent in a rural view. It is considered the scale of change would be medium and the effect would be moderate and significant (adverse) between 1.0km and 1.5km not 0.5-1.5Km. It is agreed that generally, effects beyond 1.5km are unlikely due to woodland blocks and undulations as evidenced in Viewpoint 6.25: PRow, East of Littley Green (Great Waltham 54).	The assessment reports the following significant and adverse levels of visual effects at the viewpoints noted in the response: • Viewpoint 6.01 – moderate-major at construction, operation year 1 and year 15 • Viewpoint 6.03 – moderate at construction, operation year 1 and year 15 • Viewpoint 6.25 – negligible at construction, operation year 1 and year 15 The Applicant notes the agreement of the assessment within 0.5 km but respects the fact that there is a difference in professional opinion in relation to the assessment of effects beyond 0.5 km. The effects between 0.5 km and 1.5 km reported in the LVIA are identified as being significant (moderate adverse). The response provided suggests effects be reported as more than moderate. Although there is a difference in professional judgement in relation to the level of effect, the Applicant notes that both judgements would be significant. The extent of identified visual effects is defined using both location specific placenames, and estimated distances across which visual effects would be experienced. All stated distances in the assessment are approximate, and not exact. It is important to note that there would be a transition in terms of levels of effect, rather than an absolute and abrupt change. Viewpoints are not always an exact proxy for visual effects across the VRA as a whole. In 8.1 Errata List [REP1-071], additional text has been included to explain this transition of effect.
8.363 – 8.369	Chelmsford City Council	<i>F2 Peverel's Farm:</i>	The assessment of views from VP6.02 and VP6.17 are presented in 6.13.A3 Environmental Statement

ID	Stakeholder	Comment	NG response
		This Visual Receptor Area is located towards the south of the Project, broadly between Fuller Street and the northern edge of Chelmsford. The sole representative viewpoint is identified as: • Viewpoint 6.02 Essex Way near Fuller Street • Viewpoint 6.17 Sheepcotes Lane, Little Waltham It is agreed the Project would be visible in close views from the north-west of the VRA, with close views from the local road network, scattered properties along the lanes, PRoW including the Essex Way (Viewpoint 6.02 Essex Way, west of Fuller Street 0.64Km) which presents gently undulating countryside views in all directions. It is disagreed that the pylons are only ‘noticeable features’ as in VP 6.02. It is considered the pylons would be prominent. Despite the removal of some existing pylons, cumulative impact would likely degrade the landscape further by closing up the openness to the north. The proposed pylons would appear larger than the existing pylons. It is considered the scale of change would be large and the effect would be major and significant (adverse) within 1.0km not 0.5km. Viewpoint 6.17: Sheepcotes Lane, Little Waltham 1.25km demonstrates that there are still moderate and significant (adverse) effects at this distance. It is considered that the scale of change would be medium and the effect would be moderate and	Appendix 13.3 - Visual Baseline and Assessment - Part 4 of 4 [APP-232] and VRA F2 in paragraph 13.9.13 to 13.9.24 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The assessment for VP6.02 considers the removal of existing pylons and concludes there would be moderate-major significant (adverse) effects at both construction and operation, which differs from the moderate and significant (adverse) effects identified in VRA F2 assessment. The viewpoint assessment does not explicitly use the wording ‘noticeable features’. It notes that the Project would affect a medium proportion of the view, and the scale of change would be large. The magnitude of effect is judged to be high. The existing 132 kV pylons (which are to be removed) are closer to the viewpoint than the proposed Project, and therefore appear taller than the proposed Project. This is illustrated in view direction 43 of VP6.02. It is assumed the comment relating to ‘cumulative impact’ is made in relation to the way the Project is itself experienced in the Study Area. Existing overhead lines are considered as part of the landscape and visual baseline, against which the effects of the Project are assessed as set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Effects from Viewpoint 6.17 are assessed as minor and not significant (adverse) at both operation and construction due to screening from vegetation, backclothing and intervening distance. The Applicant acknowledges this differs from the moderate and significant (adverse) effects identified between 0.5 km and 1.5 km in VRA F2 assessment.

ID	Stakeholder	Comment	NG response
		significant (adverse) only beyond 1.0km and up to 1.5km. Generally, beyond that it is accepted that individual impacts would be not significant.	The extent of identified visual effects is defined using both location specific placenames, and estimated distances across which visual effects would be experienced. All stated distances in the assessment are approximate, and not exact. It is important to note that there would be a transition in terms of levels of effect, rather than an absolute and abrupt change. Viewpoints are not always an exact proxy for visual effects across the VRA as a whole. In 8.1 Errata List [REP1-071], additional text has been included to explain this transition of effect.
8.375 – 8.378	Chelmsford City Council	F3 Great Waltham It is agreed that there would be close and sometimes open views of the Project from local receptors, from properties along several roads/lanes, and from scattered properties as shown in Viewpoint 6.16 Chatham Hall Lane, north of Little Waltham where pylons are very prominent and seen in full against the sky. Pylons would also appear stacked behind each other in some views. The Project would be introduced into views otherwise absent of overhead lines. It is agreed the scale of change would be large, and the effect would be major and significant (adverse), reducing to moderate and significant (adverse) from Great Waltham. It is considered generally major and significant adverse effects extend up to 1km from the Project line not 0.5km. It is considered that generally a medium scale of change and moderate and significant (adverse)	The assessment of effects on VRA F3 is included in paragraphs 13.9.25 to 13.9.37 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Effects on visual receptors within 0.5 km are assessed as major and significant (adverse) at both construction and operation. Moderate and significant (adverse) effects are reported between 0.5 km and 1.5 km from within the area of settlement at Great Waltham, and from within the grounds of Langleys RPG and Deer Park where the proposed overhead line is more likely to be screened in views, and reducing to minor and not significant (adverse) from Howe Street. The assessment reports the following significant and adverse levels of visual effects at the viewpoint noted in the response: • Viewpoint 6.16 Chatham Hall Lane – major and significant (adverse) at construction, operation year 1 and year 15 • Viewpoint 6.18 Langley's Park – minor-moderate at construction, operation year 1 and 15.

ID	Stakeholder	Comment	NG response
		effects would occur between 1.0km and extend up to 1.5km. Generally, beyond 1.5km it is accepted that individual impacts would not be significant,	The Applicant notes the agreement of the assessment within 0.5 km but respects the fact that there is a difference in professional opinion in relation to the assessment of effects beyond 0.5 km. The effects between 0.5 km and 1.5 km reported in the LVIA for the VRA F3 Great Waltham are identified as being significant (moderate adverse). The response provided suggests effects be reported as more than moderate. Although there is a difference in professional judgement in relation to the level of effect, the Applicant notes that both judgements would be significant. The extent of identified visual effects is defined using both location specific placenames, and estimated distances across which visual effects would be experienced. All stated distances in the assessment are approximate, and not exact. It is important to note that there would be a transition in terms of levels of effect, rather than an absolute and abrupt change. Viewpoints are not always an exact proxy for visual effects across the VRA as a whole. In 8.1 Errata List [REP1-071], additional text has been included to explain this transition of effect.
8.385 – 8.392	Chelmsford City Council	F4 Little Waltham There are concerns that no viewpoints have been offered outside the 0.5Km range and suggest one or more of these are needed to demonstrate that effects are reduced due to intervening settlement or vegetation. Generally, it is agreed there would be close and sometimes open views of the Project from receptors such as Chatham Hall Lane, from the local PRoW network and scattered properties, and that Pylons	The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The viewpoints were discussed with relevant Local Planning Authorities, as set out in the Statements of Common Ground (5.9.1 to 5.9.12 [REP1-010 to REP1-032]). The LVIA viewpoints are a representative selection of publicly accessible locations along the Project, capturing a range of receptors and a variety of distances and viewing directions. The number of viewpoints assessed in the LVIA (206 viewpoints) is

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		would be seen in full in places from less vegetated sections such as Chatham Hall Road, with much of the pylon's structure prominently visible against the sky. There is deep concern regarding the amount of vegetation proposed for removal as demonstrated in Viewpoint 6.13: B1008, Little Waltham. Pylons would appear stacked behind each other in some views from locations close to the alignment, such as near Lark's Lane and Chelmsford Road. The Project would be introduced into views otherwise absent of overhead lines. It is agreed that the scale of change would be large, and the effect would be major and significant (adverse), reducing to moderate and significant (adverse) within Little Waltham. It is considered that major significant adverse effects occur up to 1km not 0.5km. It is further considered that generally a medium scale of change and moderate and significant (adverse) effects do not occur until 1.0km and extend up to 1.5km. Generally, beyond 1.5km it is accepted that individual impacts would be not significant.	considered to be proportionate and appropriate in relation to the scale of the Project. In addition, there are a further 47 viewpoints and accompanying visualisations that support the historic environment assessment. A historic environment viewpoint (HE31) is included in Little Waltham. The locations of all viewpoints are shown on 6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [REP1-066]. The assessment of construction effects on visual receptors recognises that some vegetation removal would occur within VRA F4 Little Waltham and VRA F3 Great Waltham, including in views from Viewpoint 6.13. The Environmental Statement is based on an assumed worse case tree and hedgerow removal, including that near Little Waltham, as detailed within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] and illustrated in 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]. Paragraph 8.2.3 of 7.4 Outline Landscape and Ecological Management Plan (Revision C) confirms that, following detailed design and prior to construction, relevant surveys would be undertaken to reduce removal of trees/hedgerows as far as practicable, and this is recorded as commitment GG14 within 7.2 Outline Code of Construction Practice(Revision B). Measures to avoid/mitigate impacts to all trees (including veterans) is also a Project commitment LV05 in 7.2 Outline Code of Construction Practice (Revision B) . Section 9.4 of 7.4 Outline Landscape and Ecological Management Plan (Revision C) outlines the commitment to reinstate hedgerow field boundaries. The Applicant has made the commitment

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			to 3:1 replacement planting for individual trees and small groups of individual trees within 7.4 Outline Landscape and Ecological Management Plan (Revision C). This is secured by Requirement 4 within 3.1 Draft Development Consent Order [APP-056]. Details of on-site tree planting will be provided in accordance with the Reinstatement Planting Plan secured under Requirement 9 of 3.1 Draft Development Consent Order [APP-056]. The Project would prioritise the replanting for individual trees within the Order Limits, however off-site provision may be required. Any off-site tree planting required because of this commitment would be secured via a legal agreement. This is discussed further in the Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting section in Chapter 3 of this report. The Applicant notes the agreement of the assessment within 0.5 km but respects the fact that there is a difference in professional opinion in relation to the assessment of effects beyond 0.5 km. The assessment of effects on VRA F4 is included in paragraphs 13.9.38 to 13.9.50 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Effects on receptors between 0.5 km and 1.5 km are assessed at both construction and operation, as moderate and significant (adverse), particularly from more elevated areas to the south and west of Little Waltham, and the north of Little Waltham, where parts of the proposed overhead line would be visible in some views. This includes at Blasford Hill and Broomfield near Woodhouse Lane and the B1008 in the south and the area close to Sheepcotes Lane in the north. Effects would reduce to low from within the lower-lying and/or more screened areas of settlement, including from the south and eastern edges of Little

ID	Stakeholder	Comment	NG response
			Waltham, Blasford Hill and Broomfield. Beyond 1.5km, effects would reduce to minor and not significant, with increased distance from the Project and screening from intervening buildings, landform and woodland contributing to a smaller scale of change and lower magnitude of effect. The response provided suggests effects be reported as more than moderate. Although there is a difference in professional judgement in relation to the level of effect, the Applicant notes that both judgements would be significant. The extent of identified visual effects is defined using both location specific placenames, and estimated distances across which visual effects would be experienced. All stated distances in the assessment are approximate, and not exact. It is important to note that there would be a transition in terms of levels of effect, rather than an absolute and abrupt change. Viewpoints are not always an exact proxy for visual effects across the VRA as a whole. In 8.1 Errata List [REP1-071], additional text has been included to explain this transition of effect.
8.395 – 8.397	Chelmsford City Council	F5 Chignall Smealy There would be some filtering of views by existing vegetation, but not to the height to screen a large structure completely at odds with the rural scene. The Project would be introduced into views otherwise absent of overhead lines. It is agreed that the scale of change would be large, and the effect would be major and significant (adverse) in close-to views. Major significant	The assessment of effects on VRA F5 is included in paragraphs 13.9.51 to 13.9.62 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The Applicant notes the agreement of the assessment within 0.5 km but respects the fact that there is a difference in professional opinion in relation to the assessment of effects beyond 0.5 km. The effects between 0.5 km and 1.5 km reported in the LVIA for the VRA F5 at both construction and operation are

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		adverse effects would occur up to 1km not 0.5km. It is considered that generally a medium scale of change and moderate and significant (adverse) effects do occur between 1.0km and extend up to 1.5km. Generally, beyond 1.5Km it is accepted that individual impacts would be not significant,	identified as being significant (moderate adverse). The response provided suggests effects be reported as more than moderate. Although there is a difference in professional judgement in relation to the level of effect, the Applicant notes that both judgements would be significant.
8.401 – 8.402	Chelmsford City Council	F6 Chelmsford North-West It is considered major significant adverse effects occur up to 1Km not 0.5 Km. Generally a medium scale of change and moderate and significant (adverse) effects occur between 1.0km and extend up to 1.5km. Beyond 1.5Km, generally it is accepted that individual impacts would be not significant.	The assessment of effects on VRA F6 is included in paragraphs 13.9.63 to 13.9.74 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The Applicant notes the agreement of the assessment within 0.5 km but respects the fact that there is a difference in professional opinion in relation to the assessment of effects beyond 0.5 km. The response provided suggests effects be reported as more than moderate. Effects on receptors at both construction and operation between 0.5 km and 1.5 km are assessed as moderate and significant (adverse), reducing to negligible and not significant within Chelmsford and Broomfield. Although there is a difference in professional judgement in relation to the level of effect, the Applicant notes that both judgements would be significant.
8.405 – 8.407	Chelmsford City Council	F7 Roxwell It is agreed that the scale of change would be large, and the effect would be major and significant (adverse) in close-to views. It is considered major significant adverse effects occur up to 1km not 0.5km.	The assessment of effects on VRA F7 is included in paragraphs 13.9.75 to 13.9.86 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The Applicant notes the agreement of the assessment within 0.5 km but respects the fact that there is a difference in professional opinion in relation to the

ID	Stakeholder	Comment	NG response
		It is considered generally a medium scale of change, and moderate and significant (adverse) effects do not occur less than 1.0km and extend up to 1.5km. Viewpoint 6.06 Galleons Hill, Roxwell at 1.03km demonstrates at least moderate adverse effects. Generally, beyond 1.5km it is accepted that individual impacts would be not significant, although the effects on Viewpoint 6.08 Cooksmill Green at 1.76km are arguably still moderate adverse.	assessment of effects beyond 0.5 km. The response provided suggests effects be reported as more than moderate. Effects on receptors at both construction and operation between 0.5 km and 1.5 km are assessed as moderate and significant (adverse). Significant adverse effects (moderate) are assessed on Viewpoint 6.06, located at approximately 1.03 km, at both construction and operation. This is in line with the judgements for this distance assessed in VRA F7. Significant adverse effects (moderate) are assessed on Viewpoint 6.08, located approximately 1.76 km, at both construction and operation. It is acknowledged this differs from the VRA F7 assessment. Although there is a difference in professional judgement in relation to the level of effect, the Applicant notes that both judgements would be significant. The extent of identified visual effects is defined using both location specific placenames, and estimated distances across which visual effects would be experienced. All stated distances in the assessment are approximate, and not exact. It is important to note that there would be a transition in terms of levels of effect, rather than an absolute and abrupt change. Viewpoints are not always an exact proxy for visual effects across the VRA as a whole. In 8.1 Errata List [REP1-071], additional text has been included to explain this transition of effect.
8.410 – 8.415	Chelmsford City Council	F8 Writtle and Chelmsford West Generally, it is agreed that the Project would be visible in close views from the west of the VRA, with the overhead line prominent in views and likely seen on the skyline with some filtering and screening from	The Applicant notes the agreement of the assessment within 0.5 km but respects the fact that there is a difference in professional opinion in relation to the assessment of effects beyond 0.5 km. The response provided suggests effects be reported as more than

ID	Stakeholder	Comment	NG response
		existing vegetation and farm buildings / college buildings along Cow Watering Lane. The Project would be introduced into views otherwise absent of overhead lines.	moderate. The assessment of effects on VRA F8 is included in paragraphs 13.9.87 to 13.9.98 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229] .
		Generally, it is agreed that the Project would be visible in close views from the east of the VRA, and that the overhead line is likely prominent in views, as seen on the skyline with little filtering, including from PRow. The Project would be introduced into views otherwise absent of overhead lines.	Effects on receptors at both construction and operation between 0.5 km and 1.5 km are assessed as moderate and significant (adverse), reducing to negligible and not significant within Writtle.
		It is agreed that the scale of change would be large, and the effect would be major and significant (adverse) in close-to views.	The Applicant notes the text relating to Viewpoints 6.06 and 6.08 in paragraphs 8.415 and 8.416 of the Local Impact Report are not relevant to VRA F8. Viewpoints relevant to VRA F8 are Viewpoints 6.19 and 6.23.
		It is considered major significant adverse effects occur up to 1km not 0.5kmm.	Significant adverse effects (moderate) are assessed on Viewpoint 6.19 and Viewpoint 6.23 located within the 0.5 km to 1.5 km distance band, at both construction and operation. This is in line with the judgements for this distance assessed in VRA F8.
		Generally, a medium scale of change and moderate and significant (adverse) effects occur less than between 1.0km and 1.5km. Viewpoint 6.06 Galleons Hill, Roxwell at 1.03Km demonstrates at least moderate adverse effects.	Although there is a difference in professional judgement in relation to the level of effect, the Applicant notes that both judgements would be significant.
		Beyond 1.5Km, generally we accept that individual impacts would be not significant, although the effects on Viewpoint 6.08 Cooksmill Green at 1.76km are arguably still moderate adverse.	The extent of identified visual effects is defined using both location specific placenames, and estimated distances across which visual effects would be experienced. All stated distances in the assessment are approximate, and not exact. It is important to note that there would be a transition in terms of levels of effect, rather than an absolute and abrupt change. Viewpoints are not always an exact proxy for visual effects across the VRA as a whole. In 8.1 Errata List [REP1-071] , additional text has been included to explain this transition of effect.

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8.418 – 8.425	Chelmsford City Council	F9 Edney Common This is another VRA where there are no viewpoints in the wider landscape, so VP 6.09 is the sole representation of the VRA at 0.75Km. This is a deeply rural landscape in many aspects and should be represented by further viewpoints both closer to and at c1.5Km from the line. While it is accepted that views are limited to the south of the area beyond 1km due to intervening woodland, it is advised that assessment should be made of the area west of Edney Common around footpath Highwood 7 where long- distance views are possible. Generally, it is agreed that the Project would be visible in close views from the east of the VRA, with the overhead line prominent in views from the north of the VRA and likely to be seen on the skyline. Woodland at Bakers Wood and around Coptfold Hall would screen and filter views towards the Project in the south, as would the tree cover surrounding properties along Nathan's Lane. The Project would be introduced into a landscape otherwise absent of overhead lines. It is agreed that the scale of change would be large, and the effect would be major and significant (adverse) in close-to views. It is considered major significant adverse effects occur up to 1Km not 0.5 Km. Viewpoint 6.09 The Causeway Edney Common, 0.75KM, is	The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The viewpoints were shared and discussed with relevant Local Planning Authorities, as set out in the Statements of Common Ground (5.9.1 to 5.9.12 [REP1-010 to REP1-032]). The LVIA viewpoints are a representative selection of publicly accessible locations along the Project, capturing a range of receptors and a variety of distances and viewing directions. The number of viewpoints assessed in the LVIA (206 viewpoints) is considered to be proportionate and appropriate in relation to the scale of the Project. The locations of all viewpoints are shown on 6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [REP1-066]. The assessment of effects on VRA F9 is included in paragraphs 13.9.99 to 13.9.110 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The Applicant notes the agreement of the assessment within 0.5 km but respects the fact that there is a difference in professional opinion in relation to the assessment of effects beyond 0.5 km. The response provided suggests effects be reported as more than moderate. Effects on receptors at both construction and operation between 0.5 km and 1.5 km are assessed as moderate and significant (adverse), reducing to minor and not significant (adverse) in the south of the VRA and south of Nathan's Lane at Little Edney Wood. The area to the west of Edney Common, around footpath Highwood 7 is located over 1.5 km away.

ID	Stakeholder	Comment	NG response
		representative of this, showing stacking of pylons receding into the distance. Generally, a medium scale of change and moderate and significant (adverse) effects occur between 1.0KM and 1.5 km. Beyond 1.5Km, generally it is accepted that individual impacts would be not significant.	Receptors beyond 1.5 km are assessed as minor and not significant (adverse), reducing to negligible and not significant from the south-west of the VRA, along the wooded valley floor and at settlement west of Ellis Wood. Significant adverse effects (moderate-major) are assessed on Viewpoint 6.09, located at approximately 0.75 km distance, at both construction and operation. It is acknowledged this differs from the VRA F9 assessment. Although there is a difference in professional judgement in relation to the level of effect, the Applicant notes that both judgements would be significant. The extent of identified visual effects is defined using both location specific placenames, and estimated distances across which visual effects would be experienced. All stated distances in the assessment are approximate, and not exact. It is important to note that there would be a transition in terms of levels of effect, rather than an absolute and abrupt change. Viewpoints are not always an exact proxy for visual effects across the VRA as a whole. In 8.1 Errata List [REP1-071], additional text has been included to explain this transition of effect.
8.432 – 8.435	Chelmsford City Council	F10 Hylands Park Generally, it is agreed that the Project would be visible in close views from the east of the VRA, with the overhead line likely prominent in views and seen on the skyline. Woodland, such as King Wood, hedgerows and trees would filter and screen views in places including along parts of Writtle Road. The Project would be visible in a landscape otherwise absent of overhead lines.	The assessment of effects on VRA F10 is included in paragraphs 13.9.111 to 13.9.122 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The Applicant notes the agreement of the assessment within 0.5 km but respects the fact that there is a difference in professional opinion in relation to the assessment of effects beyond 0.5 km. The response

ID	Stakeholder	Comment	NG response
		It is agreed that the scale of change would be large, and the effect would be major and significant (adverse) in close-to views. Major significant adverse effects would occur up to 1Km not 0.5 Km. It is considered that generally a medium scale of change and moderate and significant (adverse) effects occur between 1.0km and 1.5 km. Beyond 1.5km generally it is accepted that individual impacts would be not significant.	provided suggests effects be reported as more than moderate. Effects on receptors at both construction and operation between 0.5 km and 1.5 km are assessed as moderate and significant (adverse), reducing to negligible and not significant within VRA F10 Hylands Park. Although there is a difference in professional judgement in relation to the level of effect, the Applicant notes that both judgements would be significant.
8.437 – 8.438	Chelmsford City Council	F11 Margaretting and Stock The additional viewpoints 7.10 and 7.12 are welcomed. The impact from Viewpoint 7.10 is judged to have no effect (not significant). The location of this viewpoint from a road behind a hedgerow is queried. There are several public rights of way through Stock where the topography appears higher, and which could offer further long distance views. These should be explored. Viewpoint 7.12 is judged as major and significant (adverse) which is agreed. Yet the visualisation is presented as a wireline which we consider should be a photomontage, considering the pylons are proposed within an open landscape. A photomontage would better represent the significant effects of the introduction of pylons within this viewpoint.	The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The viewpoints were discussed with relevant Local Planning Authorities, as set out in the Statements of Common Ground (5.9.1 to 5.9.12 [REP1-010 to REP1-032]). The LVIA viewpoints are a representative selection of publicly accessible locations along the Project, capturing a range of receptors and a variety of distances and viewing directions. The number of viewpoints assessed in the LVIA (206 viewpoints) is considered to be proportionate and appropriate in relation to the scale of the Project. The locations of all viewpoints are shown on 6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [REP1-066]. Viewpoint 7.10: B1007 Stock Road, South of Stock was included to represent views from the B1007. The viewpoint was located at a gap in the hedgerow which runs along the west side of the road. The Applicant

ID	Stakeholder	Comment	NG response
			agrees that outward views are limited from this location. Significant adverse effects (major) are assessed on Viewpoint 7.12, located at approximately 0.22 km distance, at both construction and operation. This has been illustrated with a wireline. Illustration with a wireline is recognised as a standard tool in LVIA. The limitations of wirelines are recognised, in that they do not use photography, show buildings or vegetation. However, they allow for an accurately scaled representation of the change to be modelled, based on a digital terrain model of the bare ground, and are a helpful tool in informing an understanding of and illustrating changes. Many detailed photomontages are provided, as well as wirelines, ZTVs and other graphical materials. This information together with the written reporting is considered sufficient and proportionate, enabling the assessor, and in turn the decision maker, to make a well-informed judgement, without the need for further photomontages. The conclusions of the LVIA will not change as a result of adding new assessment or illustrated viewpoints, however, if parties consider the provision of a visualisation helpful then this could be provided.
8.154 and 11.12	Chelmsford City Council	Visually, the siting of pylons close to residential properties would have a harmful and unacceptable impact upon the occupant's amenities, both visually and spatially, where the pylons would have an overbearing and dominant impact upon the properties. It is noted that a number of properties are sited less than 200 metres away from the proposed pylons	Impacts on residential visual amenity, as a result of the Project, have been considered within 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]. This assesses effects on residential properties within 200 m of the centreline of the Project. Of the properties scoped into the assessment, 37 are anticipated to experience a high magnitude of change to visual amenity. For all other properties, a combination of distance, orientation of property and

ID	Stakeholder	Comment	NG response
		and overhead lines and would be noticeable and potentially overbearing.	existing views, filtering of views towards the Project, and/or screening of these, would result in effects of a medium to high magnitude or less.
8.158	Chelmsford City Council	There are a number of residential properties and other sensitive receptors sited within 200 metres of the proposed pylons, overhead lines and construction areas. The dwellings most affected, and the pylon numbers are listed below: TB141 – 72 m from Windmill House, Chelmsford Road, Great Waltham	After consideration of feedback during consultations in 2025, the three low height pylons which were proposed closest to Windmill House have been changed to two standard lattice pylons and will be moved further away from the house. The increased span between the pylons and distance from the house would reduce expected effects on visual amenity at this property. Effects on Windmill House are assessed on page 94 of Table A13.4.3 and on page 167 of Table A13.4.42 within 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment - Part 1 of 2 [APP-233].
6.59	Brentwood Borough Council	While the ES acknowledges significant adverse effects within 0.5km of the OHL, BBC maintains its position that adverse impacts relevant to the open and rural nature of the borough will extend up to 1.5km, particularly in the semi-enclosed landscapes that are characteristic of it. This is particularly the case in the following designated Landscape Character Areas (LCA's) and 1 Visual Receptor Areas (VRA's) in Brentwood: • VRA G1 Ingatestone & Fryerning – significant adverse effects on PRow and heritage settings • VRA G4 Ingrave & Herongate – major adverse effects on Thorndon Country Park and Dunton Hills Garden Village • LCA D2: Brentwood Hills – semi-enclosed hills, high sensitivity, major adverse effects up to 1 km	The LVIA set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] identifies effects on landscape and visual receptors. Significant adverse residual effects on landscape and visual receptors are identified on receptors up to a distance of approximately 1.5 km on VRA G1 (paragraphs 13.10.1 to 13.10.12) and VRA G4 (paragraphs 13.10.37 to 13.10.48), as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229] and, LCA D2 Brentwood Hills (paragraphs 13.3.736 to 13.3.756) and LCA 13 Dunton Settled Claylands (paragraphs 13.3.849 to 13.3.863), as set out in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228].

ID	Stakeholder	Comment	NG response
		LCA 13: Dunton Settled Claylands – wholly impacted; incompatible with Dunton Hills Garden Village vision for a sustainable garden community.	The assessment team has thoroughly explored potential effects on landscape out to at least 3 km from the Project, and their findings and judgements are set out, in an objective and consistent manner, at 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] and 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The Applicant has considered these comments and, whilst respecting the fact that different assessors may reach different judgements, as noted in GLVIA3, the Applicant remains comfortable with the judgements made in the LVIA and the reasoning given.
6.60	Brentwood Borough Council	In addition to the above, BBC would highlight that it considers viewpoint 7.07 in the ES – that has used a ‘wireline’ image rather than photomontage – does not accurately convey, albeit illustratively, the actual landscape and visual impacts. Other viewpoints, such as 7.06 Thorndon Country Park, have used locations from which BBC considers the impact is markedly less than it would be from alternative viewpoint locations that could equally have been used. BBC disputes the ES assertion that the viewpoints, whether representative, specific or illustrative, were selected in consultation with it, as these do not offer the best or most suitable examples of the extent of impacts on potential receptors.	Illustration with a wireline is recognised as a standard tool in LVIA. The limitations of wirelines are recognised, in that they do not use photography, show buildings or vegetation. However, they allow for an accurately scaled representation of the change to be modelled, based on a digital terrain model of the bare ground, and are a helpful tool in informing an understanding of and illustrating changes. Many detailed photomontages are provided, as well as wirelines, ZTVs and other graphical materials. This information together with the written reporting is considered sufficient and proportionate, enabling the assessor, and in turn the decision maker, to make a well-informed judgement, without the need for further photomontages. The landscape and visual viewpoints have been presented to and discussed with Brentwood Borough Council during thematic meetings and via e-mail correspondence between February 2023 and March

ID	Stakeholder	Comment	NG response
			2025. Several viewpoints have been added following discussions and requests from Brentwood Borough Council including Viewpoint 7.07 PRoW east of Ingrave, Viewpoint 7.08 Dunton Hills Farm (Dunton Hills Garden Village) and Viewpoint 7.09 PRoW near Ingatestone Hall. Where a viewpoint suggested by Brentwood Borough Council was not used, this was due to either a lack of potential visibility of the Project (due to screening or filtering of views by landform, buildings or vegetation), or the area in question being represented by an alternative viewpoint(s). The LVIA viewpoints are a representative selection of publicly accessible locations along the Project route, capturing a range of receptors and a variety of distances and viewing directions. GLVIA3 requires that representative viewpoints are selected. It does not require that every potential receptor is represented by an assessment or illustrated viewpoint, recognising that this would be impossible, and would result in a disproportionate level of information being provided, which would not be helpful to decision makers. It is important to note that the judgements presented in the LVIA, as set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] are based on first hand observations and professional judgements made during site visits and not on viewpoints and visualisations alone. The Applicant respects the fact that there is a difference in professional opinion, and as such viewpoints are noted as being under discussion with Brentwood Borough Council, as set out in the Statement of Common Ground (5.9.11 [REP1-030]).

ID	Stakeholder	Comment	NG response
6.61	Brentwood Borough Council	The above concerns are heightened by the potential cumulative effects of a multiple, unbroken chain of pylons through different areas of Brentwood and the continuous overhead linear character of the project, which will irrevocably industrialise the currently rural and pastorate landscapes and erode the scenic beauty, tranquillity, and 'sense of place' that is so valued in the borough.	It is assumed the comment relating to '<i>potential cumulative effects of multiple unbroken chain of pylons</i>' is made in relation to the way the Project is itself experienced in Brentwood and in relation to 132 kV infrastructure which is already present in the landscape. Existing overhead lines are considered as part of the landscape and visual baseline, against which the effects of the Project are assessed as set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. An existing 132 kV overhead line (known as Warley/Shenfield PUB) runs from the north-east of Hutton down to Dunton Hills where it meets another existing 132 kV overhead line (known as Tilbury/Nevendon PSC) in a cross configuration. The Project will remove sections of both of these existing 132 kV overhead lines, one section to the west of Haverings Grove and the other to the west of Southfields. Once these sections of 132 kV overhead line are removed and diverted underground, the Project would broadly run parallel to the east of the Warley/Shenfield PUB 132 kV overhead line from Little Bladen's Wood down to Dunton Hills. The Applicant recognises that there will be significant effects on landscape and visual receptors at locations along the length of the Project, and extending to some distance from it, as explained within the assessment presented in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The effects on landscape character will affect a sequence of places along the length of the line, with the effects being described in relation to each of the assessment units (in this case LCTs). Again, they will not typically be experienced as a whole, but the total effect on landscape character can be understood from the LVIA,

ID	Stakeholder	Comment	NG response
			by looking at all of its component parts, each of which is set out in detail. It is noted that overall, these effects will be significant, as would be expected for any project of this size and nature. Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the LVIA Study Area, as illustrated on 6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240]. Whilst the rural landscape will remain in place beneath and around the proposed overhead line, it is nevertheless recognised by the Applicant that significant effects on landscape character and visual amenity will occur. These effects are reported in the LVIA in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].

4.12 Noise and Vibration

Introduction

- 4.12.1 The Noise and Vibration assessment (6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256]) has been undertaken in accordance with the methodology in 6.19 Scoping Report [APP-296] and as agreed in 6.20 Scoping Opinion [APP-297]. The assessments are based on industry accepted methodology. The assessment considers construction noise and vibration, construction traffic noise and vibration, and operational noise from the proposed new EACN Substation and Tilbury North Substation. Operational noise from the proposed overhead line was scoped out of the Environmental Statement on the basis of a low noise conducted being used. However, information on noise from the overhead line is provided in 6.14.A5 Environmental Statement Appendix 14.5 – Operational Noise from Overhead Lines Informative [APP-261].
- 4.12.2 For both construction and operation (and maintenance) noise worst-case assumptions have been used to inform the assessments. Significant adverse effects are not expected at any location due to construction noise and vibration or operational noise. However, there a potential significant adverse effect due to construction traffic noise at one location – Jasmin Cottage.
- 4.12.3 As identified within the submitted Local Impact Reports, the key areas of disagreement remain around the conclusions of the construction noise and vibration assessment. These matters have been responded to through the SoCG process and we will continue to engage with the host authorities to reach further areas of agreement where possible.

Local Authority Positions

- 4.12.4 Nine Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 4.21 Noise and Vibration - Local Impact Report coverage

Local Authority	LIR Sections covering this topic
Norfolk County Council	N/A
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	Section 16
Essex County Council	Paragraphs 4.9.45 – 4.9.47, Section 5 and Section 6
Thurrock Council	Section 6.6
South Norfolk District Council	Paragraphs 3.1.10 – 3.1.16, Section 8.3 and Section 10.5
Tendring District Council	Section 13 (see the table below for detailed responses to paragraphs 13.19 – 13.21)

Colchester City Council	Section 13
Braintree District Council	Section 14 (see the table below for detailed responses to paragraphs 14.4.5 - 14.4.10)
Chelmsford City Council	Paragraph 8.445 – 8.478 and Section 9
Brentwood Borough Council	Paragraph 6.66-6.72

- 4.12.5 The Applicant has engaged extensively with Local Authorities on matters relating to Noise and Vibration. This is reported in detail in Statements of Common Ground (SoCGs) (see Table 1.1 for Examination Library references). Within the SoCGs, matters are categorised as Agreed, Not Agreed or Under Discussion.
- 4.12.6 Each SoCG includes a table listing each environmental topic chapter in the Environmental Statement. Under each environmental topic chapter subheading, are a list of seven categories which are aligned with how the Environmental Impact Assessment was undertaken.
- 4.12.7 The bullet points below (split by category) provide a summary of where agreements are currently up to with the host Local Authorities relating to Noise and Vibration (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG). Only eight of the 12 Local Authorities' SoCGs contain matters relating to Noise and Vibration.
- Matters relating to EIA – Regulatory, Planning Policy Context and Guidance are under discussion with five out of eight Local Authorities
 - Matters relating to EIA – Approach and Methods are agreed with five out of eight Local Authorities
 - Matters relating to EIA – Baseline Conditions are under discussion with five out of eight Local Authorities
 - Matters relating to EIA – Embedded, Standard and Additional Mitigation Measures are under discussion with five out of eight Local Authorities
 - Matters relating to EIA – Assessment Conclusions are under discussion with five out of eight Local Authorities
 - Matters relating to Draft DCO / Outline Management Plans / Mitigation and Monitoring are under discussion with all eight Local Authorities
 - Three Local Authorities have an 'other matters' category in their SoCGs, which are under discussion with all three Local Authorities.

The following key points remain not agreed, and will be subject to ongoing engagement:

- Mitigation measures (South Norfolk Council and Tendring District Council – Not Agreed)
- Approach and methods, baseline conditions and assessment conclusion (South Norfolk Council – Not Agreed)

4.12.8 The table below reflects the category (agreed, under discussion, not agreed), most frequently recorded across the SoCGs for each of the 13 Local Authorities relating to Noise and Vibration (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG).

Image 4.8 Noise and Vibration - Categorisation of Matters in Statements of Common Ground

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Conditions	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring	Other Matters as Required
Norfolk County Council	-	-	-	-	-	-	-
Suffolk County Council	-	-	-	-	-	-	-
Essex County Council	-	-	-	-	-	-	-
Thurrock Council	-	-	-	-	-	-	-
South Norfolk Council	Under discussion	Not agreed	Not agreed	Not agreed	Not agreed	Under discussion	Under discussion
Babergh and Mid Suffolk Councils	Under discussion	Agreed	Under discussion	Under discussion	Under discussion	Under discussion	-
Tendring District Council	Agreed	Agreed	Under discussion	Not agreed	Agreed	Under discussion	-
Colchester City Council	Agreed	Agreed	Agreed	Agreed	Agreed	Under discussion	-

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Conditions	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring	Other Matters as Required
Braintree District Council	Agreed	Agreed	Agreed	Under discussion	Under discussion	Under discussion	Under discussion
Chelmsford City Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion
Brentwood Borough Council	Under discussion	Agreed	Under discussion	Under discussion	Under discussion	Under discussion	-
Basildon Borough Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	-

Responses to New Matters and Applicant Clarifications

- 4.12.9 The table below sets out the Applicant's response to the matters raised in the Local Impact Reports that the Applicant previously has not addressed in their documents, including Statements of Common Ground with Local Authorities or in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**.

Table 4.22 Noise and Vibration – Responses to New Matters and Applicant Clarifications

ID	Stakeholder	Comment	NG Response
13.19 to 13.21	Tendring District Council	Foundation methods: Use non-percussive techniques (pad foundations, press-in piles, pre-boring) by default within 250 m of NSRs. Temporary screening: Minimum 10 dB insertion loss screening around semi-static plant/jointing	The Applicant is committing to employing best practicable means (BPM) to reduce the effects of construction noise and vibration. Specific mitigation measures will be determined following detailed construction noise and vibration assessments by the Main Works Contractor(s), as per commitment NV05 of

ID	Stakeholder	Comment	NG Response
		rigs/compounds where lines of sight exist to NSRs within 250 m; acoustic sheds for trenchless drive sites close to NSRs (ES indicates up to 15 dB benefit). Batching plant and compounds near Little Bromley/Ardleigh to be re-sited or re-oriented to shield NSRs where RSCNVA shows exceedance risk, with fixed hours aligned as set out above	7.2 Outline Code of Construction Practice (Revision B). Mitigation in the form of BPM will be identified and employed to avoid potential significant adverse effects and reduce potential adverse effects as per the range of commitments in 7.2 Outline Code of Construction Practice (Revision B), with the Noise and Vibration Management Plan (NVMP) being updated accordingly. The range of mitigation options considered will include those stated by Tendring District Council. However, specific measures, such as the use of non-percussive piling techniques by default, cannot be committed to at this time as it depends on a number of non-acoustic factors such as ground conditions. However, if non-percussive methods are both feasible and efficacious, they would be adopted in line with the commitment to employ BPM.
14.4.5 to 14.4.7	Braintree District Council	The Applicant confirmed that, unlike underground cables which were assessed across the full extent of the Order Limits, the assessment for pylons did not extend to the wider LoD or to the potential extent of longitudinal or lateral deviation. While it was asserted that constraints on pylon siting, particularly the requirement to retain overhead conductors within the LoD, would limit deviation from the assessed locations, it was nevertheless acknowledged that some lateral deviation could still occur. The Applicant also confirmed that pylon construction areas, defined as extensive areas surrounding each assessed pylon location (approximately 60 m² for standard pylons and 70–80 m² for angled pylons), represent the areas within which construction activities could potentially take place. The extent of these areas raises concern, as they have not been assessed in detail and may	It was discussed with representatives from Braintree District Council during a meeting on 30 January 2026 that the construction noise and vibration assessment provided in 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256] included consideration of works at the closest point of the working area to each noise sensitive receptor (NSR) as a worst case, based on the level of detail available at this stage. Additionally, the Applicant clarified that a review of potential pylon movement within the LoD was undertaken to identify any locations where movement may lead to significant adverse effects. No such locations were identified. Further detailed assessments would be undertaken by the Main Works Contractor(s) based on their specific

ID	Stakeholder	Comment	NG Response
		result in construction-related noise sources being located closer to existing sensitive receptors than those assumed within the Environmental Statement. In light of the above, the Council considers that uncertainty remains as to whether noise impacts arising from construction activities have been fully and robustly assessed, particularly where pylon construction areas extend beyond the immediate vicinity of the assessed pylon locations.	methodology, specific plant items, specific works location (considering any movement within the LoD), as secured by commitment NV05 of 7.2 Outline Code of Construction Practice (Revision B). Specific mitigation measures would be identified by the Main Works Contractor(s) as part of their detailed assessments. The Main Works Contractor(s) are committed to employing best practicable means (BPM) to reduce the effects of construction noise and vibration by several commitments in 7.2 Outline Code of Construction Practice (Revision B).
14.4.8 to 14.4.10	Braintree District Council	The Applicant used a nominal 10 dB noise reduction figure attributed to the application of Best Practicable Means (BPM) in order to assess the likely noise impacts at the nearest sensitive receptors following mitigation. The Applicant acknowledged that this assumed 10 dB reduction represents a best-estimate of the noise attenuation likely to be achieved, and that it was adopted partly to simplify the assessment. It was further stated that a more detailed consideration of the level of mitigation required would be undertaken at the detailed design stage by the appointed contractors. The Council's view is that a worst-case approach to mitigation should be applied at this stage of the assessment. In particular, the Council considers that reliance on a nominal 10 dB reduction associated with BPM introduces uncertainty, as the effectiveness of BPM measures can vary significantly depending on factors including, but not limited to; the type of construction activity, plant used, programme, and local topography. In practice, this may result in noise reductions that are materially less than the assumed	The Applicant considers the comment from Braintree District Council to mean there is a misunderstanding of noise reductions in the construction noise assessment presented in 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256]. Although this was clarified with representatives from Braintree District Council during a meeting on 30 January 2026, the Applicant welcomes the opportunity to further clarify this point. Detailed construction noise assessments have been undertaken for every noise sensitive receptor (NSR) along the Project based on the available information. They present a relative worst-case outcome based on the worst-case (noisiest) task for each activity, for all works locations, without mitigation. Where applicable, the assessment considers activities that may occur concurrently (noting that this would reflect the worst-case tasks for each of those activities). The outcome of the assessments is therefore considered a reasonable worst case. These worst-case, unmitigated noise levels are compared against the 65 dB $L_{Aeq,T}$ threshold for

ID	Stakeholder	Comment	NG Response
		10 dB. Indeed, if the assumed 10 dB reduction is not achieved in practice, construction noise levels at sensitive receptors could be materially higher than predicted, potentially resulting in significant adverse effects that have not been robustly assessed or mitigated.	potential significant effects during the main ‘weekday’ working periods (works during weekend, bank holiday and night-time periods are considered separately, relative to lower thresholds). This separates NSRs into two categories: • Those where worst-case, without-mitigation construction noise levels are below the threshold. • Those where worst-case, without-mitigation construction noise levels are potentially above the threshold (these NSRs are identified as ‘hot-spots’). Significant adverse effects are not expected at NSRs where worst-case, without-mitigation construction noise levels are predicted to be below the threshold. These NSRs would, however, still be subject to further detailed assessments by the Main Works Contractor(s), as per commitment NV05 of 7.2 Outline Code of Construction Practice (Revision B). Mitigation in the form of BPM would still be employed to reduce potential adverse effects at these locations as per the range of commitments in the 7.2 Outline Code of Construction Practice (Revision B), with the Noise and Vibration Management Plan (NVMP) being updated accordingly. NSRs where worst-case, without-mitigation construction noise levels are predicted to be above the threshold are referred to the ‘hot-spots’. These are locations where mitigation is likely to be required to avoid significant adverse effects, relative to the findings of the assessment presented in 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256]. This ‘hot-spot’ approach is in accordance with the methodology described in 6.19 Scoping Report [APP-

ID	Stakeholder	Comment	NG Response
			296] and agreed by Braintree District Council via Wardell Armstrong (now SLR Consulting) in their Technical Note -001B 'Comments on the EIA Scoping Report in terms of Noise and Vibration (Chapter 14)', dated 22 November 2022, which is included in the 6.20 Scoping Opinion [APP-297]. In most 'hot-spot' cases a reduction smaller than 10 dB would be required to avoid significant effects. It is therefore not the case that mitigation providing at least a 10 dB reduction is required to avoid significant adverse effects at these locations. These 'hot-spot' locations are where predicted construction noise levels fall between 65 dB and 75 dB. In these situations, there is a high level of confidence that noise levels can be mitigated below the 65 dB $L_{Aeq,T}$ threshold to avoid potential significant adverse effects. There are no locations with predicted noise levels exceeding 75 dB $L_{Aeq,T}$, where reductions greater than 10 dB would be required to similarly avoid potential significant adverse effects. This confidence stems from a number of factors: • The assessment assumes worst-case plant for source noise levels. If quieter plant were used, noise levels would be lower. • The assessment assumes the worst-case task for each activity. Noise levels from other tasks that form that activity would be lower. • Where the assessment assumes multiple activities occurring simultaneously, each task uses the worst-case activity. Where activities do not occur simultaneously, or where the worst-case activity is not taking place, noise levels would be lower.

ID	Stakeholder	Comment	NG Response
			• The assessment includes the LoD. Where works are located within the LoD, or at the proposed swathes or works location, they would therefore be further from the NSR than assumed in 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256], and noise levels would be lower. • The assessment includes consideration of works at the nearest point to all NSRs. As above, where works are located further from NSRs, noise levels would be lower. • The assessment assumes activities occur over the whole assessment period (but include percentage on-times). If activities occurred over a shorter period, noise levels over the assessment period would be lower. • The assessment has no consideration of site layout or orientation (e.g., locating plant further from NSRs). Where site layout and orientation is considered by the contractor(s), noise levels would be lower. • The assessment does not include consideration of alternative methods. Where quieter alternative methods can be used, noise levels would be lower. • The assessment does not include the effects of screening. Where activities are screened from NSRs, noise levels would be lower. • The assessment does not include other BPM that may be identified by the contractor. Where measures are identified, noise levels would be lower.

ID	Stakeholder	Comment	NG Response
			Based on these points, there is a high level of confidence that construction noise levels assessed in 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256] falling in the range of 65 to 75 dB $L_{Aeq,T}$ can be reduced to below 65 dB $L_{Aeq,T}$ during the actual works. Many of the factors identified above are around refinements to assumptions, rather than the introduction of mitigation. It is likely that many threshold exceedances would not occur (irrespective of mitigation) once assessment assumptions are refined by the Main Works Contractor(s). That said, mitigation in the form of BPM would be implemented for all works, whether above the threshold or not. As a final consideration, should the Main Works Contractor(s) detailed assessments identify exceedance of the noise level threshold, significant effects would only occur where the temporal criteria for significant effects are also exceeded. In such instances, temporal restrictions would be implemented to ensure that threshold exceedances would not be of sufficient duration to cause a significant adverse effect. In summary, it is not the case that mitigation providing 10 dB attenuation is required to avoid significant adverse effects from construction noise associated with the Project.

4.13 Socio-economics, Recreation and Tourism

Introduction

- 4.13.1 The Socio-Economics, Recreation and Tourism assessment (**6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**) has been undertaken in accordance with **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** based on industry accepted methodology and professional judgement.
- 4.13.2 The scope and methodology of the Socio-economics, Recreation, and Tourism assessment have been discussed with statutory stakeholders through a series of thematic group meetings prior to submission. Following these meetings, technical notes outlining the updated scope and methodology were circulated to statutory stakeholders to seek agreement. There have been ongoing engagement with statutory stakeholders around the Statement of Common Ground.
- 4.13.3 As identified within the submitted Local Impact Reports, the key areas of disagreement remain around the proposed mitigation measures and assessment conclusions. These matters have been responded to through the SoCG process and we will continue to engage with the host authorities to reach further areas of agreement where possible.

Local Authority Positions

- 4.13.4 All Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 4.23 Socio-economics, Recreation and Tourism - Local Impact Report coverage

Local Authority	LIR Sections covering this topic
Norfolk County Council	Section 12 (see the table below for detailed responses to paragraphs 12.6)
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	Section 10 (see the table below for detailed responses to paragraphs 10.6)
Essex County Council	Section 4.8 (see the table below for detailed responses to paragraphs 4.3.46 – 4.3.47, 4.8.16, 4.8.18 – 4.8.19)
Thurrock Council	Section 6 (see the table below for detailed responses to paragraphs 6.7.13, 6.7.16 - 6.7.17, 6.7.19, 6.7.23, 6.14.12, 6.14.25, 6.12.27 - 6.12.29)
South Norfolk District Council	Sections 8.6 and 10.8

Local Authority	LIR Sections covering this topic
	(see the table below for detailed responses to paragraphs 8.6.2, 10.8.1, 10.8.2)
Tendring District Council	Section 18 (see the table below for detailed responses to paragraph 18.1)
Colchester City Council	Section 14 (see the table below for detailed responses to paragraphs 14.18-14.19, 14.24, 14.25)
Braintree District Council	Section 17
Chelmsford City Council	Paragraphs 8.479 to 8.497 and Addendum (see the table below for detailed responses to paragraphs 8.483, Addendum 3.17 – 3.22)
Brentwood Borough Council	Paragraphs 6.73 to 6.78 (see the table below for detailed responses to paragraphs 6.8, 6.23)

- 4.13.5 The Applicant has engaged extensively with Local Authorities on matters relating to Socio-Economics, Recreation and Tourism. This is reported in detail in Statements of Common Ground (SoCGs) (see Table 1.1 for Examination Library references). Within the SoCGs, matters are categorised as Agreed, Not Agreed or Under Discussion.
- 4.13.6 Each SoCG includes a table listing each environmental topic chapter in the Environmental Statement. Under each environmental topic chapter subheading, are a list of seven categories which are aligned with how the Environmental Impact Assessment was undertaken.
- 4.13.7 The bullet points below (split by category) provide a summary of where agreements are currently up to with the host Local Authorities relating to Socio-Economics, Recreation and Tourism (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG). For matters related to Socio-Economics, Recreation and Tourism, Braintree District Council defers to Essex County Council.
- Matters relating to EIA – Regulatory, Planning Policy Context and Guidance are under discussion with 7/12 Local Authorities.
 - Matters relating to EIA – Approach and Methods are under discussion with 8/12 Local Authorities.
 - Matters relating to EIA – Baseline Conditions are under discussion with 9/12 Local Authorities
 - Matters relating to EIA – Embedded, Standard and Additional Mitigation Measures are under discussion with 11/12 Local Authorities
 - Matters relating to EIA – Assessment Conclusions are under discussion with 11/12 Local Authorities
 - Matters relating to Draft DCO / Outline Management Plans / Mitigation and Monitoring are under discussion with 11/12 Local Authorities.

- 4.13.8 The following key points remain not agreed, and will be subject to ongoing engagement:
- Proposed mitigation measures (Norfolk County Council, Suffolk County Council, Essex County Council, Thurrock Council, South Norfolk Council, Tendring District Council, Colchester City Council, Chelmsford City Council, Brentwood Borough Council and Basildon Borough Council – Not Agreed)
 - Assessment conclusion (Suffolk County Council, Essex County Council, Thurrock Council, South Norfolk Council, Babergh and Mid Suffolk Councils, Tendring District Council, Colchester City Council, Chelmsford City Council, Brentwood Borough Council and Basildon Borough Council – Not Agreed)

4.13.9 The table below reflects the category (agreed, under discussion, not agreed), most frequently recorded across the SoCGs for each of the 13 Local Authorities relating to socio-economics, recreation and tourism (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG).

Image 4.9 Socio-economics, Recreation and Tourism- Categorisation of Matters in Statements of Common Ground

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Condition	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring	Other matters as required
Norfolk County Council	Under discussion	Agreed	Agreed	Under discussion	Agreed	Agreed	Under discussion
Suffolk County Council	Under discussion	Agreed	Under discussion	Under discussion	Under discussion	Under discussion	-
Essex County Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion
Thurrock Council	Agreed	Agreed	Agreed	Under discussion	Under discussion	Under discussion	-
South Norfolk Council	Agreed	Agreed	Agreed	Under discussion	Under discussion	Under discussion	-
Babergh and Mid Suffolk Councils	Under discussion	Under discussion	Under discussion	Agreed	Under discussion	Under discussion	-
Tendring District Council	Agreed	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	-
Colchester City Council	Agreed	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	-

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Condition	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring	Other matters as required
Braintree District Council	Responded by ECC	Responded by ECC	Responded by ECC	Responded by ECC	Responded by ECC	Responded by ECC	Responded by ECC
Chelmsford City Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion
Brentwood Borough Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	-
Basildon Borough Council	Agreed	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion

Responses to New Matters and Applicant Clarifications

4.13.10 The table below sets out the Applicant's response to the matters raised in the Local Impact Reports that the Applicant previously has not addressed in their documents, including Statements of Common Ground with Local Authorities or in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**.

Table 4.24 Socio-economics, Recreation and Tourism – Responses to New Matters and Applicant Clarifications

ID	Stakeholder	Comment	NG response
12.6	Norfolk County Council	SCC has submitted a copy of the CAA AAT's response to the 2024 consultation as an appendix to its LIR, which includes a description of the impacts on Tibenham and	A detailed response to all airfields related comments is provided in the Safety and Security-Airfields section of this report.

ID	Stakeholder	Comment	NG response
		Priory Farm airfields. This document sets out that power lines would act as a permanent vertical obstruction which would affect pilot decision making and safety outcomes and could seriously prejudice the ability of the aerodromes to operate.	
8.483	Chelmsford City Council	Paragraph 5.13.7 of NPS – EN1 (2023) reiterates the need to consider accommodation, advising that Applicants should consider developing accommodation strategies where appropriate, especially during construction and decommissioning phases, that would include the need to provide temporary accommodation for construction workers if required.	There would be minimal construction employment opportunities anticipated to arise from the Project. A visitor bedspace assessment has been undertaken as part of the Environmental Statement and set out in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265], which concludes that no significant effects on visitor bedspace are anticipated. It is therefore not considered that a specific accommodation strategy is required for this Project and would be disproportionate to the scale of the potential effect. Potential effects during the decommissioning phase have been scoped out of the Environmental Statement as agreed in 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297]. Requirement 13 Decommissioning within 3.1 Draft Development Consent Order [APP-056] states that <i>‘(1) In the event that, at some future date, the authorised development, or part of it, is to be decommissioned, a written scheme of decommissioning must be submitted to the relevant planning authority for its approval in consultation with the relevant highway authority, at least six months prior to decommissioning</i>

ID	Stakeholder	Comment	NG response
			<i>works. (2) The approved scheme must be implemented as approved as part of the decommissioning of the authorised development or relevant part of it. (3) This requirement does not apply to the part of the authorised development and associated development described in Schedule 1 (authorised development) which relates to the dismantling and removal of existing infrastructure or apparatus. (4) The written scheme of decommissioning submitted under sub paragraph (1) must include environmental assessment undertaken in accordance with the laws and regulations applicable at the time it is submitted to the relevant planning authority.'</i>
Addendum 3.17	Chelmsford City Council	In relation to Anglia Ruskin University, Writtle College Cow Watering Campus, a new paragraphs 8.490a – f are created. Chelmsford City Council is further concerned that the Project would harmfully impact upon the operation and function of the Equine Unit; which is both a Further Education (FE) and Higher Education (HE) teaching facility, at Cow Watering Lane, Writtle, in respect of both permanent operational and construction effects leading to economic harm to the operation of the site.	These receptors have been assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265], Table 15.21: Residual construction effects on community facilities within the Local Study Area, and Table 15.27: Residual operation (and maintenance) effect on community facilities (see Equine centre - Writtle University College). The assessment concludes a temporary, short-term, minor adverse and not significant effect during construction, and permanent, long-term, neutral and not significant effect during operation (and maintenance) on the receptors listed in Chelmsford City Council and Essex County Council's comment.
Addendum 3.18	Chelmsford City Council	The proposed construction access route would extend through the site, severing the operation of the Campus, affecting access and parking provision and would likely cause disruption to neighbouring teaching rooms, stabling blocks and	

ID	Stakeholder	Comment	NG response
		menage. The Project would likely impact upon health and safety, increased noise pollution and increased traffic along the highway network.	
Addendum 3.19	Chelmsford City Council	The highway feasibility and highway safety implications of the proposed construction route through the Campus need to be assessed to ensure that the proposed access route through the Campus is acceptable in highway terms.	
Addendum 3.20	Chelmsford City Council	The proposed Overhead lines would be sited directly above horse grazing areas, making them unusable during and after construction, leading to loss and usability of the fields and associated indirect impacts upon horses. Whilst effects may be temporary, it is understood that reinstated groundworks could over a year to become equine-safe.	
Addendum 3.21	Chelmsford City Council	The Project has potential to affect the function and operation the site, leading to the loss of practical learning with associated impacts and cause detrimental harm to staff, students and animals by reason of increased noise and vibration. Separately and unrelated to planning there may also be safeguarding issues.	
Addendum 3.22	Chelmsford City Council	It is considered that the Overhead line route should be resited to the north of the Campus to avoid grazing paddocks and equine facilities and construction access provided elsewhere; to a new location that	

ID	Stakeholder	Comment	NG response
		does not extend across the University Campus grounds, with associated effects considered and mitigated as appropriate.	
4.8.18	Essex County Council	For example, ECC is concerned that the Project would harmfully impact upon the operation and function of the Equine Unit; which is both a Further Education (FE) and Higher Education (HE) teaching facility, at Cow Watering Lane, Writtle - in respect of both permanent operational and construction effects leading to economic harm to the operation of the site.	
4.8.19	Essex County Council	The proposed construction access route would extend through the site, severing the operation of the Campus, affecting access and parking provision and would likely cause disruption to neighbouring teaching rooms, stabling blocks and menage. The Project would likely impact upon health and safety, increased noise pollution and increased traffic along the highway network. The Project therefore has potential to affect the function and operation the site, leading to the loss of practical learning with associated impacts and cause detrimental harm to staff, students and animals by reason of increased noise and vibration. ECC also questions whether, separately and unrelated to planning, there may also be safeguarding issues.	
6.8	Brentwood Borough Council	In addition to these directly affected receptors, the local economy that is central to the	Assessment of the potential effects on community facilities and businesses within the Local Study

ID	Stakeholder	Comment	NG response
		community in the Haverings Grove area – which includes small independent businesses as well as a dance school, a garden centre and religious facilities – is also likely to be affected by traffic disruption and road closures over a prolonged period during the construction and undergrounding work.	Area (i.e. the Order Limits) has been undertaken in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] . Those located beyond the Local Study Area (i.e. the Order Limits) were scoped out of the Environmental Statement to maintain a proportionate assessment as agreed in 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] owing to the distance the receptors are from the Project. These include South East Ballet Scholars, Adagio School of Dance, Billericay Nurseries, Kingdom Hall of Jehovah's Witnesses and Seventh-Day Adventist Church.
6.23	Brentwood Borough Council	The masterplan provides for a Local Equipped Area for Play (LEAP) in its southeastern corner, but this is the location where pylon TB229 is proposed and therefore the masterplan would need to be amended to re-provide this play space. Consequently, the Play Strategy for the Garden Village would not be deliverable in full and the reprovision of this facility elsewhere on the site, if possible, will have an inevitable knock-on effect on the overall integrity of the masterplan.	An overarching response to comments related to Dunton Hills Garden Village is provided in Chapter 3, Alternatives – Dunton Hills Garden Village, including in relation to the LEAP. The Project has been designed to follow an existing gas pipeline through and within a corridor formed by the Building Proximity Distance in the vicinity of the Dunton Hills Garden Village proposal to reduce potential effects. The assessment undertaken in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] , Table 15.26: Potential construction effect on planning and development assessed a temporary, short-term, negligible and not significant residual effect is anticipated on the Dunton Hills Garden Village proposal during
4.3.46	Essex County Council	A Local Equipment Area for Play (“LEAP”) is proposed in the location where pylon TB229 is proposed. Therefore, the proposed development would need to be amended to re-provide this play space and as a result, the Play Strategy would not be deliverable in full.	

ID	Stakeholder	Comment	NG response
4.3.47	Essex County Council	The location of the play space is illustrated in Figure E below (red dot bottom right).	construction. Table 15.31: Potential operation (and maintenance) effect on planning and development assessed a permanent, long-term, neutral and not significant residual effect during operation (and maintenance).
10.6	Suffolk County Council and Babergh and Mid Suffolk	Decommissioning could create minor positive impacts for local supply chains and employment, but these will be short-lived unless linked to long-term skills and business development strategies. Risks of workforce displacement and churn remain, as experienced with other NSIPs.	Potential effects during the decommissioning phase have been scoped out of the Environmental Statement as agreed in 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] . Requirement 13 within 3.1 Draft Development Consent Order [APP-056] states that '(1) <i>In the event that, at some future date, the authorised development, or part of it, is to be decommissioned, a written scheme of decommissioning must be submitted to the relevant planning authority for its approval in consultation with the relevant highway authority, at least six months prior to decommissioning works. (2) The approved scheme must be implemented as approved as part of the decommissioning of the authorised development or relevant part of it. (3) This requirement does not apply to the part of the authorised development and associated development described in Schedule 1 (authorised development) which relates to the dismantling and removal of existing infrastructure or apparatus. (4) The written scheme of decommissioning submitted under sub paragraph (1) must include environmental assessment undertaken in accordance with the laws and</i>
6.7.17	Thurrock Council	There is the potential for short-term employment opportunities associated with decommissioning activities, however a clear description of the types, skills and numbers of workers anticipated for construction and decommissioning is required from the Applicant in order to fully assess the impact.	
6.7.19	Thurrock Council	Temporary disruption to businesses and access during decommissioning, this is similar in nature to the construction phase economic development impacts, if it is not appropriately managed.	

ID	Stakeholder	Comment	NG response
			<i>regulations applicable at the time it is submitted to the relevant planning authority.'</i>
4.8.16	Essex County Council	The structure and methodology of the Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism (APP-265) is generally accepted, although it is noted Essex County Council is not included in the study area, despite both Norfolk County Council and Suffolk County Councils being included.	The Applicant welcomes confirmation from Essex County Council that the methodology of the assessment set out in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] is accepted. Please note that the boundary of Norfolk County Council and Suffolk County Council does not form the study area of the assessment. The Wider Study Area is set out in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265], paragraph 15.4.4 which states that the boundaries of the selected Local Planning Authorities collectively define the Wider Study Area. This approach is deemed proportionate, as using the county boundary would be excessively large for the scope of the assessment. The following districts/boroughs within Essex County Council are included within the Wider Study Area: Basildon Council, Braintree District Council, Brentwood Borough Council, Chelmsford City Council, Colchester City Council and Tendring District Council. A Socio-economics, Recreation and Tourism technical note was shared with Essex County Council in March 2025. A response was received from Essex County Council in April 2025, confirming the Wider Study Area was acceptable in principle.

ID	Stakeholder	Comment	NG response
6.7.13	Thurrock Council	The Application does not provide sufficient clarity or detail to enable the Council to assess how business disruption will be minimised, monitored and addressed in real time during the construction phase.	The proposed mitigation on potentially affected businesses is set out in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265], Section 15.6, as well as 7.2 Outline Code of Construction Practice (Revision B). The Project team will continue to engage with businesses which will potentially be affected during the progress of the Project. A point of contact will also be available to respond to queries and concerns as set out in commitment GG30 of the 7.2 Outline Code of Construction Practice (Revision B).
6.7.16	Thurrock Council	Limited evidence has been provided to demonstrate that long-term operational impacts on strategic employment areas have been fully minimised.	The potential operational effects on businesses located within the Grays (i.e. one of the Thurrock key strategic employment areas) are set out in 6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within the 3 km Study Area [APP-266]. The assessment has been undertaken as set out in 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297]. The rest of the strategic development sites set out in the Thurrock Economic Growth Strategy are located beyond the Project and not anticipated to be significantly affected by the Project.
6.7.23	Thurrock Council	The socio-economic assessment set out in the Environmental Statement Chapter 15 and supporting documentation provide limited Thurrock specific analysis of impacts on strategic employment areas, port related activity, and logistics operations.	

ID	Stakeholder	Comment	NG response
6.14.12	Thurrock Council	Potential for early investment in temporary or permanent improvements to PRoWs, greenways and access to open spaces as part of haul road rationalisation and reinstatement plans, improving active travel to parks and leisure sites.	The presumption is that haul roads will be removed at the end of the construction programme, in line with commitment GG07 in 7.2 Outline Code of Construction Practice (Revision B) and Requirement 10 of Schedule 3 to 3.1 Draft Development Consent Order [APP-056] .
6.14.25	Thurrock Council	Legacy enhancements: fund targeted Green Grid links and wayfinding to connect South Ockendon, Tilbury and Chadwell St Mary to parks and riverside; small grants for community activation when routes reopen.	However, the Draft Development Consent Order [APP-056] would not prevent a haul road being retained where appropriate and subject to: • Agreement with the relevant Local Highway Authority and landowner; and • that it would not result in materially new or different effects to those assessed in the ES. To date, during engagement with the Applicant, Thurrock Council has not indicated any intention to retain haul roads. The Applicant would welcome clarification of the specific locations that Thurrock Council is referring to so that the matter can be appropriately considered.
6.14.27	Thurrock Council	The submitted documents identify key open spaces and PRoW in Thurrock, but the assessment of Recreation and Leisure is high level and not presented as a separate, detailed topic.	The assessment of Recreation and Leisure has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] , and it is set out in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] , Table 15.23: Residual construction effect on recreational land, Table 15.24: Residual construction effects on PRoW within the Local Study Area, Table 15.29: Residual operation (and

ID	Stakeholder	Comment	NG response
			maintenance) effect on recreational land and Table 15.30: Residual operation (and maintenance) effect on recreational routes. More detailed mitigation on Recreation and Leisure (e.g. Public Rights of Way and Open Access Land) is set out in the 7.6 Outline Public Rights of Way Management Plan [APP-329]. Therefore, the level of detail provided is typical of a Development Consent Order project of this type.
6.14.28	Thurrock Council	There is not a clear explanation as to how construction will affect everyday use of parks, playing fields or community activities, which makes it difficult to confirm alignment with NPPF requirements to protect valued recreational spaces.	Although the National Planning Policy Framework⁸³ is relevant, the Project will be tested against National Policy Statements EN-1 and EN-5. The Environmental Statement has been undertaken in accordance with the scope set out in the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297]. The management measures on Recreation and Leisure and the management measures are set out in the 7.6 Outline Public Rights of Way Management Plan [APP-329]. These include the proposed management regime and the indicative duration of impact.
6.14.29	Thurrock Council	There is also not a clear, specific mitigation for recreation and leisure, so it is not possible to confirm whether the proposals meet Thurrock Core Strategy policies CSTP9 and CSTP20 on safeguarding leisure and open space.	Although the Core Strategy is relevant, the Project will be tested against National Policy Statements EN-1 and EN-5. The Environmental Statement has been undertaken in accordance with the scope set out

⁸³ Ministry of Housing, Communities and Local Government (2024) *National Planning Policy Framework*

ID	Stakeholder	Comment	NG response
			in the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297]. The effects on Recreation and Leisure are set out in the 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] and the associated management measures are set out in the 7.6 Outline Public Rights of Way Management Plan [APP-329]. These include the proposed management regime and the indicative duration of impact.
8.6.2	South Norfolk District Council	The district's tourism offer i.e. market towns, historic churches, Waveney Valley, Boudicca Way, museums and walking routes may experience reduced visitor appeal due to landscape and construction impacts.	The potential effect on the tourism economy is set out in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] , paragraphs 15.7.15 to 15.7.19. The potential effects on the tourism economy within the Wider Study Area during construction are assessed as temporary, short-term, negligible adverse and not significant.
10.8.1	South Norfolk District Council	Town centres, heritage locations, walking routes and visitor-dependent businesses may face reduced attractiveness during construction and from long-term landscape change.	
10.8.2	South Norfolk District Council	There is limited local benefit in terms of direct electricity supply, despite the substantial infrastructure being hosted within the district.	Local benefit on electricity supply is not an Environmental Impact Assessment matter.
18.1	Tendring District Council	...NGET's own ES acknowledges extensive recreational assets, PRowS, visitor accommodation and tourism-related businesses within Tendring that will experience access constraints, temporary closures, construction-related disturbance, and—in some locations—significant adverse	Although some significant effects persist, National Policy Statement policy does not require all impacts to be mitigated, nor are all impacts capable of being mitigated as set out in 5.6 Planning Statement [APP-085]. Please note that separate discussions are ongoing with the potential affected landowners

ID	Stakeholder	Comment	NG response
		residual effects, including permanent loss of recreational sites and disruption to established leisure uses. TDC's SoCG confirms that many of these impacts remain unresolved and that NGET has not provided adequate or district-specific mitigation proposals.	within Tendring District (e.g. Fishing lake north-west of Ardleigh) regarding potential compensation and this matter falls outside the scope of the Environmental Impact Assessment.
14.18	Colchester City Council	The Council note the concerns of Essex and Suffolk Police as set out at their Open Floor Hearing submission. It is clear that they will need to be adequately funded to ensure that a bespoke team can deal with the significant additional policing requirements a scheme like this will demand to ensure it does not come at the detriment of day-to-day policing in the Essex area.	The Applicant is continuing to work closely with Essex Police and Suffolk Constabulary to understand the potential additional policing needs during the Project's construction and to agree on the best way to address them. The Applicant is also working closely with Essex Police and Suffolk Constabulary to confirm the number of abnormal loads on the public highway that may require escort during the Project's construction, as well as any associated additional policing needs.
14.19	Colchester City Council	Further to this it is critical that the applicants fund a dedicated traffic police team to deal with the matter of escorting abnormal loads on the public highway.	To date the Applicant has shared with the Police forces proposed Abnormal Indivisible Load (AIL) routes, indicative volumes of AIL movements and indicative programme dates as set out in 7.3 Outline Construction Traffic Management Plan – Appendix A - AIL Access Strategy [APP-310]. The Applicant has held regular meetings with the Police forces and will continue to engage to agree on the most appropriate and effective way to address the anticipated demand for AIL escorts.
14.24	Colchester City Council	Businesses would be negatively impacted by construction of project infrastructure, and without regular communication and notification about project works may struggle to adapt. Therefore, it is considered that the applicant	Although funding provision is not an Environmental Impact Assessment matter and falls beyond the scope of the 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-

ID	Stakeholder	Comment	NG response
		should ensure a specific local business co-ordinator role is funded to enable businesses can be notified of disruption in advance, enabling them to prepare where they can.	265] assessment, the Applicant is committed to informing potentially affected businesses on the construction programme to aid businesses in adapting to the potential changes from construction works. 7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305] includes details of Project contacts and the complaints procedure.
14.25	Colchester City Council	As raised in other sections, including Noise and Vibration, reducing working hours during weekends would help to reduce negative impacts on businesses.	The current assumption on construction work hours during the weekends would be 07:00 to 17:00 as set out in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] . The Applicant's stance on working hours is set out in the Draft Development Consent Order, Requirements and Management Plans section of this document. 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] considered the noise and vibration effects on business as part of construction, and concluded these were of low sensitivity and no significant effects would be expected.

4.14 Traffic and Transport

Introduction

- 4.14.1 The Traffic and Transport Assessment (**7.11 Transport Assessment [APP-333]** and **6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271]**, alongside the associated outline management plans **7.3 Outline Construction Traffic Management Plan [APP-309]** and **7.6 Outline Public Rights of Way Management Plan [APP-329]** have been undertaken in accordance with **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** and are based on industry accepted methodology and professional judgement.
- 4.14.2 The scope and methodology of the traffic and transport assessment have been discussed with statutory stakeholders through a series of Traffic and Transport Working Group thematic meetings prior to the Development Consent Order (DCO) submission. Following these meetings, draft reports, Road Safety Audits and methodologies were circulated to the stakeholders to seek agreement. There is ongoing engagement with statutory stakeholders to reach agreement on the matters set out in the Statements of Common Ground.
- 4.14.3 As identified within the submitted Local Impact Reports, the key areas of disagreement remain around proposed mitigation for construction traffic and suitability of access routes. These matters are being responded to through the SoCG process and we will continue to engage with the host authorities to reach further areas of agreement where possible.

Local Authority Positions

- 4.14.4 All Local Impact Reports raised Traffic and Transport as a topic in the following sections of the Local Impact Reports:

Table 4.25 Traffic and transport - Local Impact Report coverage

Local Authority	LIR Sections covering this topic
Norfolk County Council	Section 13 (see the table below for detailed responses to paragraphs 4.3, 13.1, 13.3, 13.4, 13.6, 13.9 – 13.12, 13.16)
Suffolk County Council, Babergh District Council and Mid Suffolk District Council	Sections 12 and 18 (see the table below for detailed responses to paragraphs Table 10 Item 10a – 10g, 12.87 – 12.132, 12.136 – 12.141, 12.143, 12.147 – 12.151, 12.153, 12.154, 12.156, 12.157, 12.159, 12.162, 12.171, 12.178, 12.181, 12.185, 12.187, 12.188, 12.191, 12.192, 18.4, 18.7, 18.9, Table 15 Item 15b – 15g, Table 15 item 15j, Table 15 item 15l – 15q, 18.32, 18.33, 18.35, 18.43, 18.45, 18.46)
Essex County Council	Section 4.5

Local Authority	LIR Sections covering this topic
	(see the table below for detailed responses to paragraphs 4.4.33, 4.4.34, 4.4.40- 4.4.42, 4.4.45, 4.4.46, 4.4.53, 4.5.65, 4.5.66, 4.5.68, 4.5.70- 4.5.75, 4.5.77, 4.5.78, 4.5.80, 4.5.81, 4.5.85 – 4.5.87, 4.5.89, 4.5.91, 4.5.92, 4.5.98, 4.5.99, 4.5.101 – 4.5.104, 4.5.106, 4.5.108, 4.5.112, 6.20.4 – 6.20.6, 6.20.9 – 6.20.12, 6.21.5 – 6.21.7, 6.21.9 – 6.21.11, 6.21.13, 6.21.14)
Thurrock Council	Section 6.1, Section 6.13 and Section 6.14 (see the table below for detailed responses to paragraphs 6.1.13 - 15, 6.1.16 - 17, 6.1.22, 6.1.25, 6.1.47, 6.1.50, 6.1.56 – 6.1.58, 6.1.66, 6.13.11, 6.13.12, 6.13.25, 6.14.25)
South Norfolk District Council	Sections 8, 9 and 10
Tendring District Council	Section 19 (see the table below for detailed responses to paragraphs 12.11, 12.3, 12.5, 14.16, 14.18, 19.3 – 19.5)
Colchester City Council	Section 15
Braintree District Council	Section 17 (see the table below for detailed responses to paragraphs 17.2.1, 17.2.2)
Chelmsford City Council	Paragraphs 8.498 – 8.510
Brentwood Borough Council	Paragraphs 6.79 – 6.89 (see the table below for detailed responses to paragraphs 6.7, 6.82, 6.83, 6.85, 6.87)

- 4.14.5 The Applicant has engaged extensively with Local Authorities in their remit as the host local highways authority on matters relating to Traffic and Transport. This is reported in detail in Statements of Common Ground (SoCGs) (see Table 1.1 for Examination Library references). Within the SoCGs, matters are categorised as Agreed, Not Agreed or Under Discussion.
- 4.14.6 Each SoCG includes a table listing each environmental topic chapter in the Environmental Statement. Under each environmental topic chapter subheading, are a list of seven categories which are aligned with how the Environmental Impact Assessment was undertaken.
- 4.14.7 The bullet points below (split by category) provide a summary of where agreements are currently up to with the host Local Authorities relating to Traffic and Transport (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG). Only four of the twelve Local Authorities' SoCGs contain matters relating to Traffic and Transport.
- Matters relating to EIA – Regulatory, Planning Policy Context and Guidance are agreed with 2/4 Local Authorities.

- Matters relating to EIA – Approach and Methods under discussion with 4/4 Local Authorities.
- Matters relating to EIA – Baseline Conditions are under discussion with 3/4 Local Authorities.
- Matters relating to EIA – Embedded, Standard and Additional Mitigation Measures are under discussion with 3/4 Local Authorities.
- Matters relating to EIA – Assessment Conclusions are under discussion with 3/4 Local Authorities.
- Matters relating to Draft DCO / Outline Management Plans / Mitigation and Monitoring are under discussion with 3/4 Local Authorities.
- Matters relating to Transport Assessment (TA) Regulatory, Planning Policy Context and Guidance are under discussion with 2/4 Local Authorities.
- Matter relating to Transport Assessment Approach and Methods are under discussion with 3/4 Local Authorities.
- Matters relating to Transport Assessment Mitigation measures are under discussion with 4/4 Local Authorities.
- Matters relating to Transport Assessment Baseline conditions are under discussion with 3/4 Local Authorities.
- Matters relating to Transport Assessment Future Baseline Conditions are under discussion with 3/4 Local Authorities.
- Matters relating to Transport Assessment Trip Generation are under discussion with 4/4 Local Authorities.
- Matters relating to Transport Assessment Conclusions are under discussion with 2/4 Local Authorities.
- Matters relating to the Outline Construction Traffic Management Plan (CTMP) are under discussion with 4/4 Local Authorities.
- Matters relating to the Outline Construction Workers Travel Plan (CTWP) are under discussion with 4/4 Local Authorities.
- Matters relating to Construction Access Strategy and Design are under discussion with 4/4 Local Authorities.
- Matters relating to Abnormal Invisible Load (AIL) access are under discussion with 3/4 Local Authorities.
- Matters relating to the Public Rights of Way (PRoW) Assessment Chapter are under discussion with 3/4 Local Authorities.

4.14.8 The following key points remain under discussion, and will be subject to ongoing engagement. The Applicant's position and response to these issues has been provided to the Local Highway Authorities and Local Planning Authorities through the Statement of Common Grounds meetings:

- Highway junction modelling and proposed construction traffic junction mitigation measures (Norfolk County Council, Suffolk County Council, Essex County Council, Thurrock Council- Under Discussion)

- AIL Movements and suitability of routes and mitigation (Suffolk County Council, Essex County Council, Thurrock Council- Under Discussion)
- Construction Worker Travel Plan Targets and Mitigations (Norfolk County Council, Suffolk County Council, Essex County Council, Thurrock Council – Under discussion)

4.14.9 The table below reflects the category (agreed, under discussion, not agreed), most frequently recorded across the SoCGs for each of the 13 Local Authorities relating to Traffic and Transport (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG). The table reflects that the three county councils and Thurrock Council as a unitary authority are the relevant local highways authorities for the Project.

Image 4.10 Traffic and Transport - Categorisation of Matters in Statements of Common Ground

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Condition	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring	Transport Assessment (TA) – Regulatory, Planning Policy Context and Guidance	Transport Assessment – Approach and Methods	Transport Assessment – Mitigation Measures	Transport Assessment – Baseline Conditions
Norfolk County Council	Agreed	Under discussion	Agreed	Agreed	Agreed	Agreed	Agreed	Agreed	Under discussion	Agreed
Suffolk County Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion
Essex County Council	Agreed	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Agreed	Agreed	Under discussion	Under discussion
Thurrock Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion
South Norfolk Council										
Babergh and Mid	-	-	-	-	-	-	-	-	-	-

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Condition	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring	Transport Assessment (TA) – Regulatory, Planning Policy Context and Guidance	Transport Assessment – Approach and Methods	Transport Assessment – Mitigation Measures	Transport Assessment – Baseline Conditions
Suffolk Councils										
Tendring District Council	-	-	-	-	-	-	-	-	-	-
Colchester City Council	-	-	-	-	-	-	-	-	-	-
Braintree City Council	-	-	-	-	-	-	-	-	-	-
Chelmsford City Council	-	-	-	-	-	-	-	-	-	-
Brentwood Borough Council	-	-	-	-	-	-	-	-	-	-
Basildon Borough Council	-	-	-	-	-	-	-	-	-	-

Local Authority	Transport Assessment – Future Baseline Conditions	Transport Assessment – Trip Generation	Transport Assessment – Conclusions	Outline Construction Traffic Management Plan (CTMP)	Outline Construction Workers Travel Plan (CWTP)	Construction Access Strategy and Design	Abnormal Indivisible Load (AIL) Access	Other matters as required
Norfolk County Council	Agreed	Agreed	Agreed	Agreed	Under discussion	Under discussion	Agreed	-
Suffolk County Council	Under discussion	Under discussion	Agreed	Under discussion	Under discussion	Under discussion	Under discussion	-
Essex County Council	Agreed	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	-
Thurrock Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	-
South Norfolk Council		-	-	-	-	-	-	-
Babergh and Mid Suffolk Councils	-	-	-	-	-	-	-	-
Tendring District Council	-	-	-	-	-	-	-	-
Colchester City Council	-	-	-	-	-	-	-	-
Braintree City Council	-	-	-	-	-	-	-	-

Local Authority	Transport Assessment – Future Baseline Conditions	Transport Assessment – Trip Generation	Transport Assessment – Conclusions	Outline Construction Traffic Management Plan (CTMP)	Outline Construction Workers Travel Plan (CWTP)	Construction Access Strategy and Design	Abnormal Indivisible Load (AIL) Access	Other matters as required
Chelmsford City Council	-	-	-	-	-	-	-	-
Brentwood Borough Council	-	-	-	-	-	-	-	-
Basildon Borough Council	-	-	-	-	-	-	-	-

Responses to New Matters and Applicant Clarifications

- 4.14.10 The table below sets out the Applicant's response to the matters raised in the Local Impact Reports that the Applicant previously has not addressed in their documents, including Statements of Common Ground with Local Authorities or in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**.

Table 4.26 Traffic and transport – responses to new matters and Applicant clarifications

ID	Stakeholder	Comment	NG response
4.3	Norfolk County Council	<i>Executive Summary</i> In the transport context, NCC considers that reliance on primary access route 8 through Diss would exacerbate existing junction constraints and is likely to create safety risks. We therefore request routing and access controls consistent with EN-1.	This is noted by the Applicant. The Applicant is committed to continuing the ongoing discussions with Norfolk County Council, with the intention of agreeing a suitable distribution of construction traffic on the A1066 between routes via Thetford and Diss. The construction routeing strategy adopted by the Applicant is in line with National Policy Statement EN-1 (2024) as it pro-actively mitigates the transport impacts through the continuous haul road strategy, with Primary Access Routes at required intervals. The modelling results within 7.11 Transport Assessment [APP-333] found that there is no predicted step change in junction performance through Diss and the additional queues can be accommodated without causing blocking back to nearby junctions or impacting the wider network. While the construction traffic will add to existing delays and queues, the junctions are already subject to congestion meaning the overall driver experience during construction will not materially change or create additional safety risks.
13.1.	Norfolk County Council	<i>Summary (Traffic and transport)</i> In light of the issues identified and consistent with EN-1, NCC requests several transport-related measures. These include updating the Applicant's transport	The Applicant is committed to the construction routeing strategy detailed within Section 5.4 of 7.3 Outline Construction Traffic Management Plan [APP-309]. The construction routeing strategy for the Project prioritises the use of haul roads to enable materials

ID	Stakeholder	Comment	NG response
		baseline to reflect more recent traffic and collision data, amending construction working hours to limit peak-period traffic generation, and requiring a construction access strategy that prioritises haul roads over direct public highway access. NCC also seeks a commitment that all HGV traffic accessing the A1066 crossing point be routed via PAR 9, which both reduces safety risks and complies with EN-1's expectation that applicants reroute traffic to less-busy parts of the network where appropriate.	and workforce to be moved along the construction corridor, minimising the use of public highways. This strategy reduces the number of construction vehicles impacting the public highway network in the vicinity of the construction corridor. Prescribed Primary Access Routes have been identified for use by construction vehicles (typically for Heavy Goods Vehicles (HGVs)) to travel from the Strategic Road Network / Major Road Network to the site access point. The Applicant notes the preference by Norfolk County Council to have construction HGVs be routed via Thetford. To present a realistic worst-case scenario, 7.11 Transport Assessment [APP-333] detailed the potential impacts through Diss, if all construction traffic were routed via Diss throughout the working day. The Applicant recognises that there are predicted capacity issues through Diss and therefore proposes that construction traffic be routed through Thetford during network peak hours to avoid exacerbating capacity issues through Diss during these time periods. The Applicant is currently proposing to route 100% of HGVs through Thetford in the network peak periods (07:00-10:00 and 15:00-19:00), and 50% of vehicles through Diss and 50% of vehicles through Thetford outside of these hours. If 100% of construction traffic travelled through Diss this would be a maximum of 31 HGVs per hour (15 in each direction) during a three-week peak period. However, with the current access proposal of 50% of construction traffic travelling through Diss outside of the network peak hours, this would be reduced to only

ID	Stakeholder	Comment	NG response												
			14/15 HGVs per hour (7 in each direction) over an indicative duration of 3 weeks. The current assessment indicates that during a five month period the number of vehicles will be between 25 and 31 HGVs per hour (including the three week peak). Under the current access proposal this would be 13/15 HGVs per hour (7 in each direction). Construction vehicles then notably reduce to under 5 HGVs per hour over an 18 month period (3 HGVs per hour under the current access proposal). These HGV vehicle numbers are summarised in the table below. A longer secondary peak is then anticipated with a total of 15 HGVs per hour (7 in each direction). This would be 4 HGVs per hour (2 in each direction) under the current access proposal. The Applicant considers it appropriate to retain access through Diss for the construction period, based on the relatively short duration of increase in HGV trips, and the relatively low number of vehicle numbers. <table><tr><th>Duration</th><th>100% through Diss (HGVs/h)</th><th>50% through Diss during interpeak (2-way) Current proposal (HGVs/h)</th></tr><tr><td>3 weeks</td><td>31</td><td>14/15</td></tr><tr><td>5 months</td><td>25-31</td><td>13/15</td></tr><tr><td>18 months</td><td>5</td><td>3</td></tr></table> The Applicant undertook an assessment in partnership with the Main Works Contractor(s) to understand the impact and feasibility of routeing all construction traffic via Thetford. The route from Thetford to the Site	Duration	100% through Diss (HGVs/h)	50% through Diss during interpeak (2-way) Current proposal (HGVs/h)	3 weeks	31	14/15	5 months	25-31	13/15	18 months	5	3
Duration	100% through Diss (HGVs/h)	50% through Diss during interpeak (2-way) Current proposal (HGVs/h)													
3 weeks	31	14/15													
5 months	25-31	13/15													
18 months	5	3													

ID	Stakeholder	Comment	NG response
			Access Points is suitable for HGV movements, with minor traffic management required. The source of material for the deliveries for Site Access Points in Diss is anticipated to be to the East of Diss; with access restricted the construction vehicles would be undertaking an approximate 103 km diversion (up to Norwich on the A140, A47 and A11), which would route vehicles on busy parts of the network inappropriately, resulting in longer journeys and increased carbon emissions. Paragraph 5.14.12 of EN-1 (January 2024) states that any mitigation (including re-routeing traffic) is only appropriate if it is feasible and operationally reasonable, therefore the Applicant considers that this option, would not comply with policy EN-1. The Applicant will engage with Norfolk County Council to provide updated traffic flow data for Site 1 A47/A140 junction and a summary of the updated collision analysis.
13.3.	Norfolk County Council	<i>Policy context</i> Paragraph 5.14.12 makes it mandatory to consider demand management measures where mitigation is necessary, including identifying opportunities to: • Reduce the need to travel by consolidating trips; • Locate development in areas already accessible by active travel and public transport; • Provide opportunities for shared mobility; • Re-mode by shifting travel to a sustainable mode that is more beneficial to the network; • Retime travel outside of the known peak times; and	7.3 Outline Construction Traffic Management Plan [APP-309] and 7.3 Outline Construction Worker Travel Plan [APP-311] include the potential demand management measures, currently considered by the Applicant. A response to each point noted is provided below • Reduce the need to travel by consolidating trips – Car sharing will be encouraged. Overhead Line Staff combining trips at main site compound to travel to site, it is anticipated that this will be in crew vans in vehicle occupancy of six. Information pack will be issued to sub-contractors on appointment of their contract and would be included as part of

ID	Stakeholder	Comment	NG response
		Reroute to use parts of the network that are less busy.	induction on the Project. The information pack will include information on car sharing principles, and process to sign up to car sharing. Further details on the information pack are available in Section 7.2 of the 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311] - Locate development in areas already accessible by active travel and public transport – Table 4.1 in 7.3 Outline Construction Traffic Management Plan - Appendix B Outline Construction Worker Travel Plan [APP-311] details the current sustainable transport options available for each of the proposed site accesses. There are two proposed site accesses for main and satellite compounds located within Norfolk. Both of these proposed locations are accessible by cyclists, with a formal National Cycle Network recognised route located within the 5 km cycle boundary, with direct connectivity to the site access within the Order Limits - Opportunities for shared mobility – 7.3 Outline Construction Traffic Management Plan - Appendix B Outline Construction Worker Travel Plan [APP-311] includes an information pack which will include information on car sharing principles and the process to sign up to car sharing. Once the location of construction workers is identified, there may be the potential option for a minibus to reduce LGV trips on the network - Re-mode by shifting travel to a sustainable mode – 7.3 Outline Construction Traffic Management Plan - Appendix B Outline Construction Worker Travel Plan [APP-311] includes strategies and

ID	Stakeholder	Comment	NG response
			measures to encourage construction workers to travel to the site via sustainable modes. 7.11 Transport Assessment Appendix G Multi-Modal Assessment [APP-340] details the options for re-mode of travelling of certain materials, and reducing the time of travel/distance travelled on the road network • Re-time travel outside of the known peak times – Construction staff are assumed to arrive before 07:00 and depart after 19:00 which are outside of the core network peaks assessed. 7.3 Outline Construction Traffic Management Plan - Appendix B Outline Construction Worker Travel Plan [APP-311] details that actual staff arrival and departure times from site will be captured and reported to Local Highway Authorities if this changes • Re-route to use parts of the network which are less busy – The mitigation measures detailed within 7.3 Outline Construction Traffic Management Plan [APP-309] mean that Construction Vehicles are prescribed to use the Primary Access Routes, so cannot re-route to avoid busy parts of the network. It is anticipated that there will be an element of the public re-routeing following advance warning signs of the potential for construction delays.
13.4.	Norfolk County Council	<i>Policy context</i> • Paragraph 5.14.15 provides a framework for requirements which the SoS may attach to consents which would result in substantial HGV traffic. These requirements may: Control numbers of HGV movements to and from	The Applicant has developed 7.3 Outline Construction Traffic Management Plan [APP-309] in consultation with Norfolk County Council. 7.3 Outline Construction Traffic Management Plan [APP-309] details that it is expected that the Main Works Contractor(s) will monitor the number of construction

ID	Stakeholder	Comment	NG response
		the site in a specified period during its construction and possibly on the routing of such movements; • Make sufficient provision for HGV parking, and associated high quality drive facilities either on the site or at dedicated facilities elsewhere, to support driver welfare, avoid ‘overspill’ parking on public roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions; and • Ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force.	vehicles accessing the site, with the potential for the data collected to be used for auditing. The monitoring of the construction routes throughout the construction phase will ensure that any change in traffic volumes which could cause material effect can be identified and discussed with the relevant Local Highway Authority when appropriate. HGV drivers not using the Primary Access Routes (PARs) and parking or waiting in inappropriate locations have been identified as matters for non-compliance, that would be investigated, and data recoded and issued quarterly to the Local Highway Authorities. 6.4 Environmental Statement Chapter 4 – Project Description [APP-130] provides details of the welfare facilities proposed for the Project. Welfare facilities are proposed to be facilitated at Main Works Compounds (Overhead Line), Satellite Compounds (Overhead Line), Primary Compounds (underground cable) and Highway Mitigation Compounds. It is expected that these welfare facilities will be available to HGV drivers. The approach to using contingency routes in circumstances where traffic movements on the road network are disrupted or compromised (impacting the use of the agreed PARs and site access points) is detailed within 7.3 Outline Construction Traffic Management Plan [APP-309]. Contingency routes will be provided by pre-established traffic diversions and diversions as set out by National Highways, the relevant highway authorities and the police. The Main Works Contractor(s) will also utilise the website OneNetwork and liaise with National Highways and Norfolk County Council on any other planned disruption.

ID	Stakeholder	Comment	NG response
13.6	Norfolk County Council	<i>Junction capacity in Diss</i> NCC is concerned that there could be safety and driver delay implications to the applicant's proposed use of PAR 8 for heavy goods vehicles ("HGVs"), as many of the junctions on that route are already over capacity. The applicant proposes that the split in HGV traffic between PAR 8 and PAR 9 is 50:50 at off-peak times and 100% via PAR 9 during PAR 8's network peak hours. In NCC's view PAR 9 is more suitable for HGV traffic at all times due to capacity constraints and also the more urban character of the A1066 through Diss.	The Applicant notes this comment. The Applicant has worked in partnership with the Main Works Contractor(s) to understand the programme and construction vehicle number implications of routing construction vehicles through Thetford. The indicative locations for construction materials indicate that construction vehicles would have to undertake a 103 km diversion, with an additional journey time of 1 hour to 1 hour 40 minutes in the network peak periods. This will have a critical impact on delivery of the programme with time-sensitive material deliveries. The Applicant has provided additional detail in the response to 13.1 above. The modelling results within 7.11 Transport Assessment [APP-333] found that there is no predicted step change in junction performance through Diss and the additional queues can be accommodated without causing blocking back to nearby junctions or impacting the wider network. While the construction traffic will add to existing delays and queues, the junctions are already subject to congestion meaning the overall driver experience during construction will not materially change or create additional safety risks.
13.9	Norfolk County Council	<i>Junction capacity in Diss</i> NCC is concerned that the effect of exceeding junction capacity on PAR 8 will cause risks to road safety and worsen driver delay by a degree that is underestimated in the ES. Table A16.4.2 in ES Appendix 16.4 – Traffic and Transport Construction Effects shows an assessment that effects on driver delay for PAR 8 are not significant on the basis of magnitude of change. Where the comments in Table	The Applicant is currently proposing to route 100% of HGVs through Thetford in the network peak periods, and 50% of vehicles through Diss and 50% of vehicles through Thetford outside of these hours. This would remove construction traffic through Diss at peak times when there may be an interaction with a greater number of sensitive receptors along PAR 8 such as schools as detailed within 6.16.A2 Environmental

ID	Stakeholder	Comment	NG response
		A16.4.2 indicate that effects on driver delay for PAR 9 have been adjusted down on the basis of detailed modelling, it is notable that a converse exercise has not been done for PAR 8. This is despite an acknowledged high receptor sensitivity and substantial effects on driver delay and capacity shown in the detailed modelling.	Statement Appendix 16.2 - Traffic and Transport Baseline Conditions [APP-273]. The magnitude of impact and significance of effects for driver/public transport passenger delay for PAR 8 is moderate due to the small increase to future baseline traffic as a result of construction movements for the Project. Although mitigation is currently proposed to remove construction traffic through Diss at network peak periods, the magnitude of impact and significance of effects were retained as moderate due to the existing congestion at junctions along the A1066 through Diss as identified by the modelling presented within 7.11 Transport Assessment [APP-333]. Based on the modelling, there is no predicted step change in junction performance at junctions along the A1066 through Diss and the additional queues can be accommodated without blocking back to nearby junctions or impacting the wider network. While the construction traffic will add to existing delays and queues, the junctions are already subject to congestion meaning that the overall driver experience during construction would not materially change or create additional safety risks due to the minimal increase in traffic.
13.10.	Norfolk County Council	<i>Junction capacity in Diss</i> On the basis that directing HGVs through PAR 9 would be far less impactful than PAR 8, NCC would ask that the applicant commit to directing 100% of their HGV traffic bound for these accesses through PAR 9 rather than PAR 8.	As demonstrated in response 13.1, with the proposed mitigation the Applicant considers that directing HGVs through PAR 9 is not far less impactful than PAR 8 due to the congestion and delays already occurring through Diss. It is also noted that redirecting 100% of construction HGVs along PAR 9 results in an unreasonable diversion, which will also have a critical

ID	Stakeholder	Comment	NG response
			impact on delivery of the programme with time-sensitive material deliveries. Paragraph 5.14.12 of National Policy Statement EN-1 (January 2024) states that any mitigation (including re-routing traffic) is only appropriate if it is feasible and operationally reasonable, therefore the Applicant considers that this option, does not comply with policy EN-1.
13.11	Norfolk County Council	<i>Collisions and road safety</i> At B1134 Station Road/Long Row (PAR 7), additional traffic cannot be assumed to be acceptable until Network Rail confirms capacity at the level crossing. Pending that, increased HGV movements may pose a safety risk and cause delays.	Network Rail have confirmed that ‘<i>The track will have no limitations up to 250kN wheel load on each rail, assuming the track bed and track components are in good condition.</i>’ The level crossing sits on the public highway and has been designed to accommodate typical highways movements such as HGVs. However, the contractor will undertake detailed structural assessments of the loading on the track components and the track panels to ensure suitable capacity for HGVs and the mobile Crane Abnormal Indivisible Load.
13.12	Norfolk County Council	<i>Collisions and road safety</i> Construction access taken directly from rural roads would increase conflict points, introduce turning movements at unsuitable locations, and elevate risks to vulnerable road users. Use of haul roads is therefore critical to minimising highway safety impacts. Otherwise, the result would be additional congestion, turning conflicts, and safety risks on minor roads across rural Norfolk.	The proposed strategy for providing access for the construction of the Project proposals is set out in 7.3 Outline Construction Traffic Management Plan [APP-309]. This aligns with the position stated by Norfolk County Council through the proposed usage of a limited number of specified Primary Access Routes (PARs) and Site Access Points (SAPs) to access a construction corridor served by a largely continuous haul road along the length of the proposed alignment. Under this approach, construction traffic will be restricted to the designated PARs when not utilising main roads forming part of the Strategic Road Network (SRN) or Major Road Network (MRN). Adherence to

ID	Stakeholder	Comment	NG response
			these routes forms commitment T03 in 7.2 Outline Code of Construction Practice [Revision B]. On this basis, interactions between construction traffic and local roads not part of the specified PARs will be limited to locations where construction traffic on the haul road crosses local roads. Preliminary designs for each of the site access points and crossover points have been developed and have been subject to the Road Safety Audit (RSA) process set out in 7.11 Transport Assessment - Appendix A – Norwich to Tilbury RSA Strategy [APP-334]. The RSA process considers safety risks including turning conflicts and potential congestion at each of the proposed site access points and crossover points. For those locations in Norfolk, the Applicant has engaged with Norfolk County Council as the Overseeing Authority in the development of these RSAs. RSAs have been undertaken at 51 locations for site access points and crossing points in Norfolk, and one additional location for proposed highway mitigation measures has also been audited. Acceptance of the preliminary designs and Audit Briefs for these RSAs have been received from Norfolk County Council for all of the proposed highway locations. As requested by Norfolk County Council, some locations will require additional information and surveys to be undertaken/provided during the detailed designs, and all locations will be subject to the associated stages of RSA.
13.13	Norfolk County Council	<i>Baseline and modelling</i> NCC requires that the Applicant updates its transport baseline to use more recent and representative	The 7.11 Transport Assessment [APP-333] includes the assessment for the pre-covid period only for those junctions that connect to the Strategic Road Network

ID	Stakeholder	Comment	NG response
		collision and traffic data rather than relying on pre-COVID datasets from 2019, which may no longer reflect current patterns of travel behaviour.	(2019-2023). A review of the latest available collision data including 2024 and 2025 has been undertaken to understand whether there are any changes to cluster sites along the junctions as well as on the Primary Access Routes. The Applicant has and will continue to engage with Norfolk County Council on this matter. Traffic data used within the 7.11 Transport Assessment [APP-333] and the 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] was post-COVID using Department for Transport (DfT) 2023 counts and supplemented by ATC and Manual Classified Counts (MCC) surveys carried out in 2023 and 2024. An additional MCC has been carried out at Site 1 A47 Norwich Southern Bypass/A140 Ipswich Road in 2025 in relation to remodelling of the junction. The Applicant has and will continue to engage with Norfolk County Council on the findings of this assessment.
13.16.	Norfolk County Council	<i>Access and routing strategy</i> Changing the routing strategy around Diss to avoid PAR 8 in favour of PAR 9 would be an opportunity to achieve compliance with paragraph 5.14.12 of EN-1 by rerouting to use parts of the network that are less busy.	For the reasons set out in 13.1 above, the Applicant considers that the routeing strategy suggested by Norfolk County Council to avoid PAR 8 in favour of PAR 9 is not compliant with National Policy Statement EN-1, paragraph 5.14.12 (January 2024) which states that any mitigation (including rerouting traffic) is only appropriate if it is feasible and operationally reasonable.
Table 10 - 10a	Suffolk County Council	<i>Table 10: Summary of Impacts - Highways</i> Description of Impact: Impacts of construction traffic including AILs and in-combination effects	7.11 Transport Assessment [APP-333] details the assessment of the potential impacts on the local highway network within Suffolk. The movement of construction vehicles during peak hours or inter peak hours where required, have been subject to junction

ID	Stakeholder	Comment	NG response
		Impacts of construction on Public Rights of Way including diversions, closures and amenity Required Mitigation: Requirement requiring a Detailed Construction Traffic Management Plan, and a Detailed Abnormal Indivisible Loads Management Plan. A PROW strategy will be required. Further assessment work required on the impacts of traffic and transport. Local highway improvements. Commitments required for monitoring and controls within the Construction Traffic Management Plan to limit impacts and achieve sustainable travel patterns. Appropriate highway mitigation works where appropriate.	modelling as presented within Section 7.11 of 7.11 Transport Assessment [APP-333]. Where required, mitigation has been proposed as detailed within 7.3 Outline Construction Traffic Management Plan [APP-309]. AILs would operate outside of peak hours and have therefore not been assessed within 7.11 Transport Assessment [APP-333]. It is also noteworthy that the number of AILs would be small compared to the number of HGVs and movements would be more spread out. The Applicant has and will continue to engage with Suffolk County Council on the junction modelling and proposed mitigation. The Applicant has assessed the significance of effects on driver/public transport passenger delay, pedestrian, cyclist and horse-rider severance, amenity and fear and intimidation in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] for the daily (07:00-19:00) worst-case peak construction period for all Primary Access Routes (PAR) within Suffolk. Details of this assessment are presented within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. In general, it was found that there would be slight significance of effects taking into account the mitigation and controls detailed within 7.3 Outline Construction Traffic Management Plan [APP-309]. For PAR 23 - A1071 it was found that there would be a moderate significance of effects due to delay at Site 32 A1071 / B1113 Swan Hill roundabout due to the junction already operating over capacity in the future baseline. The Project would have a marginal impact on the junction operation when compared to the future

ID	Stakeholder	Comment	NG response
			baseline with committed development scenario. In addition, the predicted queues would not block back to nearby junctions. Furthermore, The Applicant understands that the junction layout is to be converted to a signalised crossroads as part of the approved planning application for Land north of the A1071 (DC/21/02671). The Applicant has and will continue to engage with Suffolk Couty Council on the modelling assessment being undertaken on the revised junction layout to assess the likely impact of the Project. The assessment within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] did not include AILs as these movements did not occur within the worst-case peak construction period identified within the trip generation. The impacts of construction on Public Rights of Way (PRoWs) including diversions, closures and amenity has been assessed within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. The findings of the assessment are presented within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. In general, there were no significant effects on users of PRoWs. For footpaths W-121/006/0 and W 129/025/0 there would be a diversion of 1,300 metres for a two-month duration. Although this would result in a Large significance of effects, given this is a leisure route, the increase in walking distance was not considered to have an adverse effect. The overall PRoW strategy, as set out in 7.6 Outline PRoW Management Plan [APP-329] is to maintain access along PRoW at all times during construction, either through managed access on their

ID	Stakeholder	Comment	NG response
			existing alignment, or through provision of appropriate diversions. As a result, no PRoW would be closed without a diversion in place and no severance of the overall network is anticipated. The Main Works Contractor will develop Final/Detailed Construction Traffic Management Plans (CTMPs) to be agreed prior to the commencement of each stage of the authorised development. The CTMP is secured through Requirement 4 in Schedule 3 of the 3.1 Draft Development Consent Order [APP-056]. 7.3 Outline Construction Traffic Management Plan [APP-309] already refers to a delivery plan to be prepared for each AIL movement and to using the Electronic Service Delivery for Abnormal Loads (ESDAL) system, which is the standard system (tool) used for the planning, notification, and management of AIL movements. The Applicant is therefore not proposing to prepare in addition a detailed Abnormal Indivisible Load (AIL) Plan, which would duplicate the specific delivery plans and ESDAL permits. This approach is line with recent National Grid DCO projects including Bramford to Twinstead. The Main Works Contractor will develop a Detailed PRoW Management Plan (PRoWMP) with the intention that it is to be agreed prior to the commencement of each stage of the authorised development. The detailed PRoWMP is secured through Requirement 4 in Schedule 3 of the 3.1 Draft Development Consent Order [APP-056]. In response to Suffolk County Council’s comment on further assessment work, the Applicant considers that it has undertaken an appropriate assessment of the Project’s traffic and transport impacts in line with

ID	Stakeholder	Comment	NG response
			current guidance and best practice. The Applicant would welcome further details from Suffolk County Council so that it can comment further. Section 6 of 7.3 Outline Construction Traffic Management Plan [APP-309] provides details on the commitments on the Main Works Contractor(s) to monitor the traffic impact of the Project. The Main Works Contractor will monitor the number of construction HGVs travelling to and from site, with HGV drivers not following agreed routes being a matter of non-compliance. The Primary Access Routes have been assessed for their suitability to cater for the expected Project vehicles as part of the overall Project routeing strategy.
Table 10 Item 10b	Suffolk County Council	<i>Table 10: Summary of Impacts – Highways</i> Description of Impact: Permanent or temporary loss of vegetation for highway access Required Mitigation: LEMP. Use of coppicing / cutting rather than removal	The Applicant has responded to this comment in 2.4 Ecology and Biodiversity Local Impact Report Response.
Table 10 Item 10c	Suffolk County Council	<i>Table 10: Summary of Impacts - Highways</i> Description of Impact: AIL access from port to site. Lack of resilient routes without temporary Infrastructure. Required mitigation: Provision of long-term route by investment in permanent improvements to highway structures.	The proposed 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310] sets out multiple considered Abnormal Indivisible Load (AIL) routes from port to sites across the region. The routes have been identified for their existing suitability, which limits the necessary temporary infrastructure requirements. However, the contractor will undertake detailed structural assessments along the selected AIL routes supported by their haulage specialist.

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			3.1 Draft Development Consent Order [APP-056] paragraph 13 of Part 4 of Schedule 16 outlines the Applicant's approach to extraordinary traffic with regards to condition surveys and reimbursement of expenses. This specifies that the repair of any damage that is directly attributable to the Applicant's use of the highways by extraordinary traffic will constitute an extraordinary expense. Whilst the Applicant has the discretion to reimburse the relevant highway authorities for all or part of the amount of any extraordinary expense, the relevant highway authority may have recourse to Section 59 of the Highways Act 1980 in the usual way. The Applicant recognises the concerns around long term route resilience and is considering the request made by Suffolk County Council, whilst mindful of its regulatory duties and that National Grid is one of a number of developers making use of highway infrastructure in the area. The Applicant welcomes further dialogue to understand the specifics of SCC's concerns about the resilience of routes.
Table 10 Item 10e	Suffolk County Council	<i>Table 10: Summary of Impacts – Highways: Operational Stage Impacts</i> Description of impact: ALL access from port to site. Lack of resilient routes without temporary infrastructure Required mitigation: Provision of long-term route investment in permanent improvements to highway structures	Operational effects were scoped out of the Environmental Statement (Volume 6 of the Development Consent Order application), as per 6.20 Scoping Opinion [APP-297]. 6.4 Environmental Statement Chapter 4 – Project Description [APP-130] states that, under National Electricity Transmission System Security and Quality of Supply Standards, National Grid has a duty to resecure the system after the occurrence of a secured event as soon as reasonably practicable. To achieve this, the permanent site access roads to the new East Anglia

ID	Stakeholder	Comment	NG response
			Connection Node (EACN) Substation and new Tilbury North Substation would be retained to maintain Abnormal Indivisible Load (AIL) access to the sites. As noted in paragraph 2.3.28 of the 7.3 Outline Construction Traffic Management Plan Appendix A – Abnormal Indivisible Load (AIL) Access Strategy [APP-310], access to substations is required for construction, operation and maintenance, with a permanent access route to be provided to enable 24/7 access. However, it is noted that special-order movements associated with maintenance and operational activities will be infrequent and irregular. Where special-order movements are required following completion of the construction, the standard procedure will be followed. This will include engagement with the Local Highway Authorities, and use of the Electronic Service Delivery for Abnormal Loads (ESDAL) system. The Applicant recognises the concerns around long term route resilience and is considering the request made by Suffolk County Council, whilst mindful of its regulatory duties and that National Grid is one of a number of developers making use of highway infrastructure in the area. The Applicant welcomes further dialogue to understand the specifics of SCC's concerns about the resilience of routes.
Table 10 - 10f	Suffolk County Council	<i>Table 10: Summary of Impacts - Highways</i> Description of Impact: Long-term impacts on Public Rights of Way including diversions, closures and amenity Required Mitigation:	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 the 7.6 Outline Public Rights of Way Management Plan [APP-329], is

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		Robust controls within the PRow Management Plan. PRow enhancement where required	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 PRow would be closed without a diversion in place, and no severance of the overall network is anticipated. Any temporary closures will be kept as short as practicable within the constraints of the works, and all temporarily affected PRowS will be reinstated as soon as practicable. The indicative durations of temporary closures are identified in the 7.6 Outline Public Rights of Way Management Plan [APP-329]. Whilst the intention is to reinstate any affected PRow to its original line and condition once construction is complete, and to remove any temporary mitigation, there may be opportunities for certain temporary measures to be retained as permanent improvements, subject to the agreement of the relevant Local Highway Authority and landowners. The 7.6 Outline Public Rights of Way Management Plan [APP-329] also includes details of regular site checks for compliance that will be completed across the Project. These will be undertaken by the Environmental Manager, with input from suitably experienced specialists as required, and will enable additional procedures, or mitigation measures, to be implemented where necessary.
Table 10 Item 10g	Suffolk County Council	<i>Table 10: Summary of Impacts - Highways</i> Impacts of decommissioning traffic, requirement requiring a Detailed Decommissioning Traffic Management Plan, a Detailed Port Traffic Management Plan, and a Detailed Abnormal	7.3 Outline Construction Traffic Management Plan [APP-309] is only applicable to the construction phase of the Project, not including operation, maintenance or decommissioning. Decommissioning effects were scoped out of the Environmental Statement (Volume 6

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		Indivisible Loads Management Plan. A PROW strategy will be required.	of the DCO Application), as per 6.20 Scoping Opinion [APP-297]. Table 4.12 in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] summarises the assessment of likely significant effects from decommissioning. Requirement 13 in Schedule 3 to the 3.1 Draft Development Consent Order [APP-056] sets out that: <i>‘In the event that, at some future date, the authorised development, or part of it, is to be decommissioned, a written scheme of decommissioning must be submitted to the relevant planning authority for its approval in consultation with the relevant highway authority, at least six months prior to decommissioning works.’</i> At the time of decommissioning the Applicant will engage with all relevant stakeholders and affected landowners implementing the necessary management plans, permissions, permits, etc. required at that moment in time
12.87	Suffolk County Council	<i>A143 – A140 roundabout to Lion Road junction</i> The B10777 roundabout is well used by traffic accessing both the local golf club and the town of Diss to the north. The rest of the A143 to the Lion Road junction has sweeping bends and several junctions to both the north and south which access local roads. 1.4km from the B1077 is a railway bridge, which is important to note as the A143 is part of the mobile crane AIL route	The Applicant is aware of the geometry of the A143 from the A140/A143 roundabout to the Lion Road junction and has carried out vehicle tracking to verify suitability of the route for construction vehicle access, including Abnormal Indivisible Load (AIL) movements. The largest vehicle proposed to use this route is the Mobile Crane AIL, of which a low number of movements are anticipated as noted in 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]. The railway bridge 1.4 km from the B1077 is considered suitable for the Mobile Crane AIL in its current condition based on feedback received from Suffolk County Council.

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12.88	Suffolk County Council	<i>A143 – A140 roundabout to Lion Road junction</i> There are two public rights of way which cross the A143, located between the B1077 roundabout and Crossing Road. The already high traffic flows and speeds make crossing difficult for pedestrians, and an increase in construction traffic would only compound that issue	The Applicant has assessed the significance of effects on pedestrian, cyclist and horse-rider severance in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] for the daily (07:00-19:00) worst-case peak construction period for PAR 10 – A143 Old Bury Road. Details of this assessment are presented within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. The net percentage increase in total flows defines the magnitude of impact for pedestrian, cyclist and horse-rider severance. It was concluded that the increase in traffic as a result of the Project and other committed developments on PAR 10 – A143 Old Bury Road would not result in any significant effects on severance as there is only an 8% increase in total traffic and a 23% increase in HGVs.
12.89	Suffolk County Council	<i>Lion Road (Palgrave) – junction with A140 to RG-B062 and RG-B063</i> National speed limit with sweeping bends. There are scattered dwellings with private accesses along this road. This is the main road to Palgrave from the A143 and has an hourly bus service running along it, which turns left off and right on to the A143. There are no footways located along the section that will be used by construction traffic, however there are two public rights of way which run perpendicular to this road, located approximately 275m apart. This could result in pedestrians walking along the road and verges between these links.	The Applicant has assessed the significance of effects on pedestrian, cyclist and horse-rider severance and amenity in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] for the daily (07:00-19:00) worst-case peak construction period for PAR 11 – Lion Road. Details of this assessment are presented within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. It was concluded that the increase in traffic as a result of the Project and other committed developments on PAR 11 – Lion Road would not result in any significant effects on severance and amenity as there is only an 9% increase in total traffic and there will be a notably low number of construction movements with only one HGV every five minutes.

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12.90	Suffolk County Council	<i>A143 – Lion Road junction to B1113 junction</i> The village of Wortham is bisected by the A143, with a speed limit of 30mph, with dwellings and businesses on both sides of the road. A footway runs along the north side of the road for the length of the village, with no footways on the south. There is a primary school on the south side of the road, opposite the junction with Church Lane. The north side of the road has local amenities, including a post office, tearoom and homeware shop, which are located towards the eastern end of the village.	The Applicant notes this comment. The description of the road characteristics including the provision for walking and cycling and existing sensitive receptors has been considered for the assessment in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. Details of the baseline conditions can be found in 6.16.A2 Environmental Statement Appendix 16.2 - Traffic and Transport Baseline Conditions [APP-273]. The A143 between Lion Road and B1113 junctions forms part of the Major Road Network and it has been assumed that it is suitable for HGVs. Therefore was not included within the assessment of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] as set out in 6.20 Environmental Statement Scoping Opinion [APP-297].
12.91	Suffolk County Council	<i>A143 – Lion Road junction to B1113 junction</i> The rest of the A143, from Wortham to the junction with the B1113, is national speed limit and consists of mostly straight sections of road with sparse sweeping bends. There are multiple junctions to the north and south of the road which access local roads. To the southeast of the village of Botesdale, at the junction with the B1113 heading north, there is a shared use cycleway / footway which crosses the A143, however this appears to be in poor condition which suggests it is not widely used. There are several public rights of way and bridleways that cross the A143 to the south of Botesdale, and as stated previously, the already high traffic flows and speeds make crossing difficult	Same as detailed in 12.90 above, the A143 between Lion Road and B1113 junctions forms part of the Major Road Network and therefore was not included within the assessment of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] as set out in 6.20 Environmental Statement Scoping Opinion [APP-297].

ID	Stakeholder	Comment	NG response
		for pedestrians, and an increase in construction traffic would only compound that issue.	
12.92, 12.93, 12.94, 12.95, 12.96, 12.97	Suffolk County Council	<i>B1113 Finningham Road - A143 junction to Finningham Crossroads (Wickham Road)</i> This road is national speed limit from the A143 junction to the parish boundary of Finningham, where the speed limit becomes 30mph. There are several public rights of way along the length of this road, particularly around the areas of Rookery Farm and Willow Farm. There is only a single footway on this road, located in the parish of Finningham and not interacting with any public rights of way. This runs from the S-bend 170m north of the parish boundary to the junction with Gislingham Road. The northern most section of this road is narrow and has a sharp S-bend which is difficult to navigate. It is understood that NG are proposing carriageway widening along this section in order to have 2 HGVs able to pass. This section also has junctions to local roads and farms, plus the local parish church. After this section the road opens up into open countryside with some sweeping bends and long straight sections. There are scattered dwellings, with multiple junctions to local roads on both sides. There is a sharp bend with a junction and several dwellings located approximately 1.9km north of Finningham, after which the road has more sweeping bends and less straight sections, including an S-bend approximately 170m north of the Finningham parish boundary.	7.3 Outline Construction Traffic Management Plan [APP-309] sets out the Construction Routeing Strategy utilised by the Project. This proposes the use of defined routes – termed ‘Primary Access Routes’ (PARs) – for general construction traffic to access the proposed alignment. In line with the approach set out in that document, PARs have been identified for each section of the proposed alignment. As the section of the proposed alignment between the proposed PARs on the A143 Old Bury Road (PAR H06-A1) and A1120 Bells Lane (PAR H07-A2) is of significant length (approx. 20 km), it was not considered practicable for construction of this section to be undertaken without the provision of an intermediate PAR between the two ‘A’ roads. On this basis, consideration was given to access approaches to the alignment from the A140 and B1113 in the vicinity of Finningham and Thornham Magna. This assessment included consideration of the length of potential access routes, associated traffic constraints, and the suitability of junctions with the Major Road Network and Strategic Road Network. In support of this assessment, site visits and Swept Path Analysis were undertaken. As significant concerns were identified with regards to the use of the junctions from the A140 in this area by construction traffic, it was considered that a PAR from the B1113 would be required. The proposed PAR utilising the B1113 and Wickham Road through Finningham was considered to be preferable to the

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		The final section to the crossroads with Wickham Road is 30mph and fairly straight, with junctions and accesses on the eastern side and a public right of way exiting onto the road on the western side, opposite the junction with Gislingham Road. 95m north of the crossroads is a farm / field access, at which there is a long history of drainage issues. The ditches to the north are frequently blocked, resulting in backed up water sitting in the carriageway. This has also caused extensive damage to the highway, both from the standing water breaking away the carriageway, and also verge overrun opposite the access where vehicles are avoiding the water. Due to there not being a footway in this location it is not uncommon for pedestrians to walk along the eastern verge in order to access the public right of way and playing field. Vehicles also seem to go above the posted speed limit along this section, likely as a result of the good forward visibility. <i>Wickham Road (Finningham) – B1113 crossroads to RB-B080</i> The junction with the B1113 is wide and has a short footway on the northern side, which then abruptly ends and continues on the southern side of the road, forcing pedestrians to cross over. The road narrows after the junction to approximately 5.5m on average, making 2 way HGV movements achievable but difficult. There are a large number of dwellings along both sides of the road up to the junction with Gislingham Road to the north. The aforementioned footway along the southern side of the road only extends for approximately 60m before stopping. There is a history of verge overrun and carriageway	available alternative via Gislingham, as the extent of impact on built-up areas would be lessened and carriageway widths were generally preferable. In support of this proposed PAR, a mitigation scheme for this route was also developed, as shown in 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans – Section A [APP-313]. Where Swept Path Analysis indicated that the carriageway width was insufficient for two-way HGV traffic, widening of the existing highway has been proposed. For this PAR route, widening is proposed for a short section close to the junction with the A143, denoted as B1 on the Indicative Highway Mitigation Plan noted above, and further referenced in the Suffolk County Council Local Impact Report Paragraph 12.93 [REP1-178]. Mitigation could include works to improve failing drainage systems and replace watercourse crossing structures where this is required and associated with the proposed highway mitigation widening works or construction of the site access points. The Applicant has developed 7.3 Outline Construction Traffic Management Plan [APP-309], which sets out the proposed approach to monitoring and maintenance of the public highway on routes impacted by construction traffic, which includes the undertaking of pre- and post-condition surveys, with remedial works to be agreed with relevant highway authorities.

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		slipping into the ditch on the southern side of the road approximately 20m to the west of the Gislingham Road junction.	
12.98	Suffolk County Council	<i>Eastlands Lane (Finningham)</i> This is a single track, derestricted road which accesses a farm and several public rights of way. The proposed access is 140m north of the junction, opposite a concrete laydown area used for agriculture. The route to the proposed access crosses a small bridge, the capacity of which is yet to be established. There is proposed widening of the carriageway from the junction with Wickham Road up to the proposed access, however this does not include widening of the bridge. Instead, a priority system is proposed for vehicles to cross, with southbound traffic having the right of way.	The section of Eastlands Lane described in this passage is proposed as part of PAR H06-A2, as shown in 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans – Section A [APP-313]. As shown in the plan referenced above, a widening scheme is proposed to be installed along the impacted section of Eastlands Lane to make this suitable for construction traffic. This does not include widening of the existing structure and a priority system is proposed. It has been noted that there is no existing posted weight limit for this structure provided by Suffolk County Council. Assessment of the structure will be undertaken by the Contractor for potential use by Large Mobile Crane, Abnormal Indivisible Loads (AILs) as detailed in 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310].
12.99	Suffolk County Council	<i>Eastlands Lane (Finningham)</i> This road is mainly used by the farm located at the end, plus there is a gated pedestrian crossing at the railway line located at Eastlands Farm which is part of the bridleway. There is a public right of way within the proposed construction route and a bridleway located to the north of the proposed access. It can therefore be reasonably assumed that non-motorised users will be accessing the road in this location.	The southern extent of Eastlands Lane is intended to be used as part of Primary Access Route PAR H06-A2, as shown in 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans – Section A [APP-313]. To enable this, a widening scheme is proposed along the relevant section of Eastlands Lane to make it suitable for construction traffic. Given that Eastlands Lane is an Other Route with Public Access (ORPA) and has Public Rights of Way leading off it, the 7.6 Outline Public Rights of Way Management Plan [APP-329]

ID	Stakeholder	Comment	NG response
			identifies the provision of a temporary non-motorised user route, offset to the west of Eastlands Lane where it will be used by construction traffic. This is intended to ensure that non-motorised users do not need to mix with construction and general traffic during the period in which Eastlands Lane forms part of the Primary Access Route.15a
12.101	Suffolk County Council	<i>Thornham Road (Gislingham) – RG-B076 to RG-B078 (under railway bridge)</i> There is a campsite located 200m east on the opposite side of the road to proposed access RG-B078. There are no footways or public rights of way crossing the access route, however this is the main road from the campsite to the village of Gislingham and as such could see non-motorised users.	The Applicant notes the location of the campsite which is greater than 150 m from the PAR 15 – Thornham Road which is a connector between RG-B076 to RG-B078 for a distance of approximately 450 m. Along this PAR, the increase in construction traffic is only eight movements per hour. Although the potential for interaction between pedestrians from the campsite and construction vehicles is unlikely given the walking distance along the PAR and the low number of HGV movements an hour, this location can be included within the driver information pack as part of mitigation set out in 7.3 Outline Construction Traffic Management Plan [APP-309].
12.102	Suffolk County Council	<i>A1120 (northern section) – A14 junction to RG-B093 and RG-B094</i> From the junction with the A14 to the village of Stowupland the speed limit is derestricted. At the village boundary the speed limit changes to 30mph and there is a junction with the B1115. This junction is heavily used and sees queues of traffic attempting to turn right out onto the A1120 at all times of the day.	The Applicant has discussed with Suffolk County Council the congestion issue at this junction (Site 22 - A1120 Church Rd / B1115 Stowmarket Rd Priority Junction). As part of the mitigation set out within 7.3 Outline Construction Traffic Management Plan [APP-309], it is proposed that construction traffic does not use this junction during peak hours. 7.11 Transport Assessment [APP-333] provides a summary of the modelling assessment undertaken for the junction during the off-peak period, which found

ID	Stakeholder	Comment	NG response
			that the junction would operate within capacity during the Project's worst-case peak construction period.
12.103	Suffolk County Council	<i>A1120 (northern section) – A14 junction to RG-B093 and RG-B094</i> The A1120 through Stowupland has a footway along the northern side for the length of the village. There is a signalised pedestrian crossing located at the co-op petrol station, approximately 100m northeast of the B1115 junction. There are a large number of dwellings along both sides of the road, plus various local amenities on the north side including a primary school, high school, pub and village hall.	The Applicant has designated the PAR 16 - A1120 Church Road/A1120 Bell's Lane as a sensitive route given the location of sensitivity receptors. The Applicant has assessed the significance of effects on pedestrian, cyclist and horse-rider severance and amenity in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] for the daily (07:00-19:00) worst-case peak construction period for PAR 16 - A1120 Church Road/A1120 Bell's Lane. Details of this assessment are presented within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. It was concluded that the increase in traffic as a result of the Project and other committed developments on PAR 16 - A1120 Church Road/A1120 Bell's Lane would not result in any significant effects on severance and amenity after mitigation set out in 7.3 Outline Construction Traffic Management Plan [APP-309]. However, as part of mitigation set out within 7.3 Outline Construction Traffic Management Plan [APP-309], it is proposed that construction traffic does not use the A1120 Church Road through Stowupland during peak hours and school drop-off and pick-up times.
12.104	Suffolk County Council	<i>A1120 (northern section) – A14 junction to RG-B093 and RG-B094</i> Upon leaving the village the road continues as a 30 with several bends and junctions, including a sharp bend at the junction with Saxham Street, which is well	The section referred to between the Public Rights of Way only relates to approximately 110 m along the PAR 16 - A1120 Church Road/A1120 Bell's Lane between the Site Access Points RG-B093 and RG-B094 and footpaths W-499/015/0 and W-499/016/0.

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		signposted and has good visibility. The road then becomes derestricted and heads south to the proposed access points. Approximately 100m north of the proposed accesses a public right of way crosses the road. Another right of way lays approximately 180m to the south of the proposed access. While this right of way itself is not impacted by the primary access route, there is potential for pedestrians to manoeuvre along the A1120 between the public rights of way.	At this location, it is proposed to avoid construction vehicle movements during school drop-off and pick-up times. Outside of these times and during the working hours, it is anticipated that there will be a total of 28 HGV movements per hour. Although during off-peak periods it is unlikely there will be an interaction between pedestrians walking along the PAR and there are alternative routes available, this location will be included within the driver information pack prepared as mitigation as set out in 7.3 Outline Construction Traffic Management Plan [APP-309] . The Applicant will continue to engage with Suffolk County Council on this matter.
12.106	Suffolk County Council	<i>A1120 (southern section) – A14 junction to Needham Road junction</i> There is a shared use cycleway and footway on the northbound side of the dual carriageway from the Gateway 14 roundabout to the Needham Road junction. This include signalised pedestrian crossings at the roundabout and the junction.	The Applicant notes this comment. The walking and cycling provision has been considered for the assessment in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] . Details of the baseline conditions can be found in 6.16.A2 Environmental Statement Appendix 16.2 - Traffic and Transport Baseline Conditions [APP-273] .
12.107	Suffolk County Council	<i>Mill Lane (Stowmarket) – A1120 junction to RG-B095</i> From the roundabout with the A1120 heading east to Clamp Farm is heavily industrial in nature and has numerous building projects being undertaken at present. It is also important to note that this section of road has not been adopted by Suffolk County Council at the time of writing and is therefore still designated as a private street.	The Applicant is aware of the change in land use and highway arrangements along PAR 18 – Mill Lane. The trip generation for this development was considered to be included within the TEMPro 7.2c growth factor used to estimate the future baseline traffic. Further details can be found within 6.16.A3 Environmental Statement Appendix 16.3 - Future Baseline [APP-274] .
12.108	Suffolk County Council	<i>Mill Lane (Stowmarket) – A1120 junction to RG-B095</i>	With respect to concerns raised around forward visibility on some sections of this route on Mill Lane,

ID	Stakeholder	Comment	NG response
		The road from Clamp Farm to the proposed access point is derestricted and rural in nature, with multiple twisting bends, scattered dwellings with private access and junctions to local roads. The S-bends at Clamp Farm and The Hayloft are very sharp with poor visibility, making 2-way HGV movements in these locations trickier than usual. Also at The Hayloft is a public right of way which crosses the road.	this PAR was assessed for its suitability for construction access. Mitigation measures to increase visibility are proposed and include vegetation clearance and traffic management as agreed with the Local Highway Authority. These shown in 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans – Section B [APP-314]. With the proposed mitigation, the route identified is considered to be suitable for the proposed construction traffic.
12.109	Suffolk County Council	<i>Needham Road / Stowmarket Road (Stowmarket) – A 1120 junction to RG-B097</i> The first 250m of this link is 40mph, opening up into a derestriction for the remainder of the length to the proposed access. The route is open with sweeping bends and good forward visibility. Approximately 850m east of the Needham Road junction there is a 7.5 tonne weight limit (except for loading), and also at this location is a triangular horse warning sign, suggesting there is higher than usual risk that horse riders are using this road There are accesses on both sides of the road to various businesses, plus dwellings at the eastern end of the link before the proposed access. There is a shared cycleway and footway along the north of the road which is mostly separated from the road by a verge, but there are several locations with no delineation, making it a less desirable walking route for pedestrians. There are also several public rights of way that exit onto the southbound carriageway where there is no footway, and there are no formal crossing points along the	With respect to the section of PAR H10-A1 identified on the B1113, as noted by Suffolk County Council the route is open and of suitable geometry for construction traffic. The northern approx. 1.0 km from the junction with the A1120 is dual carriageway, which transitions to a wide single-carriageway route for the approx. 1.0 km from this point to the proposed construction accesses RG-B097 and RG-B098. There are existing industrial and commercial premises in the vicinity of this route, including the Muntons Maltings site and Stowmarket Business Park. Construction traffic would pass the signed 7.5 t (Except for Loading) sign identified by Suffolk County Council, but would not be continuing past the proposed construction accesses, and therefore would not be impacting the more residential areas to the south along the B1113 in Needham Market. Similarly, Suffolk Bridleway W-117/013/0 intersects with the B1113 to the south of the proposed construction access point, in an area which would not be utilised by construction traffic.

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		road. The number 88 bus runs along this road approximately every 40 minutes Monday to Friday	The existing shared-use footway/cycleway is largely separated from the carriageway by a grass verge, and would not be impacted by the proposals other than at RG-097. From the Public Right of Way information provided by Suffolk County Council, only two public footpaths connect to the southern side of the B1113, as shown in the 2.5 Access, Rights of Way and Public Rights of Navigation Plans – Section B [APP-034]: • W-117/007/0, in the dual carriageway section adjacent to Stowmarket Business Park • W-117/011/0 joins the single-carriageway of the B1113, concurrent with Badley Walk. • These are outside of the Project order limits and are not directly impacted by the Project.
12.110	Suffolk County Council	<i>Bramford Road and Loraine Way (Bramford) – A14 junction to Bullen Lane</i> From the A14 junction the speed limit is 50mph, dropping down to 40mph at the village of Bramford. There is a long sweeping bend immediately off the A14 junction, after which the road becomes mostly straight with good forward visibility. There are several junctions on both sides of the road to local roads, plus business and dwellings with accesses along both sides of the road. The junction with Tye Lane has a cycleway crossover and is part of the Regional Cycle Route 48.	The Applicant notes this comment. The description of the road characteristics including the crossing for the Regional Cycle Route has been considered for the assessment in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. Details of the baseline conditions can be found in 6.16.A2 Environmental Statement Appendix 16.2 - Traffic and Transport Baseline Conditions [APP-273].
12.111	Suffolk County Council	<i>Bramford Road and Loraine Way (Bramford) – A14 junction to Bullen Lane</i> The road crosses over the rail line and the River Gipping on exiting the A14, which is important to note	Structures crossing the rail line and the River Gipping (approximately 0.4 km and 0.1 km from the A14 exit at Junction 52 respectively) have been confirmed by Suffolk County Council as restricted to STGO 2

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		as this is a mobile crane AIL route. There is a footway on the eastern side of the road from Broomvale House to the junction with Pound Lane. At this point the footway continues on the western side of the road, but there are no formal crossing points. The footway only runs along the western side for 150m before stopping. There are no pedestrian amenities again until the junction with Bronze Barrow Way, where the footway restarts on the eastern side of the road.	movements. The Mobile Crane Abnormal Indivisible Load assessed is of STGO 2 classification for abnormal loads and is therefore confirmed suitable at the time of review.
12.112	Suffolk County Council	<i>Bullen Lane (Bramford) – Junction with Lorraine Way to substations</i> Bullen Lane is derestricted from the junction with Loraine Way. There are several dwellings in close proximity to the junction with accesses crossing the footway onto the road. There is proposed junction widening at this location, plus a proposed construction lay-down area with access opposite the dwellings. There is a history of drainage issues at this location, with works to improve the drainage system having previously been undertaken by Suffolk Highways.	The junction between the B1113 Lorraine Way and Bullen Lane serves as part of the existing access to National Grid's Bramford Substation and has further been utilised as a construction access for similar developments in the vicinity, such as the East Anglia ONE project. As part of the Norwich to Tilbury proposals, improvement proposals have been developed to mitigate potential constraints identified at this junction and includes a spatial allowance for drainage assets to mitigate impacts on highway drainage arising from the additional impermeable area proposed as part of this highway improvement. The Applicant has engaged with Suffolk County Council in the development of these proposals, including through a Road Safety Audit of the outline design overseen by Suffolk County Council as the Local Highway Authority, and will continue to do so through the detailed design and construction. Mitigation could include works to improve failing drainage systems and replace watercourse crossing structures where this is required and associated with the proposed highway mitigation widening works or

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			construction of the site access points. The Applicant has developed 7.3 Outline Construction Traffic Management Plan [APP-309], which sets out the proposed approach to monitoring and maintenance of the public highway on routes impacted by construction traffic, which includes the undertaking of pre- and post-condition surveys, with remedial works to be agreed with relevant highway authorities.
12.113	Suffolk County Council	<i>Bullen Lane (Bramford) – Junction with Lorraine Way to substations</i> The rest of the road to the proposed access JC-B0001 is narrow and winding, with insufficient width for 2-way HGV traffic. There are localised areas of widening proposed to be undertaken by NG to help mitigate this, however there are several public rights of way that lead onto this road, suggesting it is popular with pedestrians. The lack of footway along this road already makes this a less than desirable route, and the increase in construction traffic will not improve the situation.	The identified section of Bullen Lane serves as the existing access to National Grid's Bramford Substation, and has further been utilised as a construction access for similar developments in the vicinity, such as the East Anglia ONE project. As part of the Norwich to Tilbury proposals, targeted improvements have been proposed for this section of road in order to mitigate specific identified pinch-points. The proposed PAR is considered to be suitable for the anticipated construction vehicles. From the Public Right of Way (PRoW) information provided by Suffolk County Council, the impacted section of Bullen Lane is intersected by three PRoWs, all of which are footpaths: • W-155/047/A, on the southern side of Bullen Lane, which is also connected to the below via a parallel off-road PRoW link • W-155/044/0, on the southern side of Bullen Lane • W-155/002/0, on the northern side of Bullen Lane. The Applicant has assessed pedestrian, cyclist and horse-rider delay, severance, amenity and fear and intimidation along PAR 21 - Bullen Lane in 6.16 Environmental Statement Chapter 16 - Traffic and

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			Transport [APP-271]. Considering the proposed highway mitigation where the carriageway is widened, passing places are to be provided and the notably low future baseline traffic (due to this PAR being an access road with no-through traffic), no significant effects have been identified. The Applicant will continue to engage with Suffolk County Council on this matter and will ensure liaison takes place by the Main Works Contractor(s) as the highway mitigation measures are progressed to detailed design.
12.114	Suffolk County Council	<i>A1214 – Copdock roundabout to A1071 junction</i> This is a very highly trafficked dual carriageway with good visibility, and one of the main routes into and out of Ipswich. It is derestricted for approximately 150m from the A14 junction, before becoming a 40. There is one roundabout approximately 460m north of the A14 junction which is partially signal controlled. This roundabout contains exits for local amenities such as supermarkets, hardware shops, takeaway restaurants and the local park and ride. All to the west. The eastern arm of the roundabout leads to more supermarkets and Suffolk One college. There is a signalised pedestrian crossing to the south of the roundabout.	The Applicant notes this comment. The description of the road characteristics including the provision for walking and cycling has been considered for the assessment in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. Details of the baseline conditions can be found in 6.16.A2 Environmental Statement Appendix 16.2 - Traffic and Transport Baseline Conditions [APP-273].
12.115	Suffolk County Council	<i>A1214 – Copdock roundabout to A1071 junction</i> The next section of footway along this road is located approximately 300m north of the roundabout, where the park and ride buses exit onto the A1214. The junction with the A1071 is signalised and contains both pedestrian and cycle crossing facilities.	The Applicant notes this comment. The description of the road characteristics including the provision for walking and cycling has been considered for the assessment in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. Details of the baseline conditions can be found in 6.16.A2 Environmental Statement Appendix 16.2 -

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			Traffic and Transport Baseline Conditions [APP-273].
12.116	Suffolk County Council	<i>A1071 – A1214 junction to JC-B006</i> The A1071 has a 40mph speed limit for approximately 1km from the junction with the A1214. After this the speed limit is derestricted. The road is mostly straight until Hurdle Makers Hill, where there is a sharp bend and the road generally becomes more winding to the proposed access JC-B006.	The A1071 to JC-B006 has been assessed for its suitability as a PAR. Mitigation measures proposed in 7.3 Outline Construction Traffic Management Plan Appendix C – Indicative Highway Mitigation Plans – Section C [APP-315] include temporary removal of street furniture, traffic management as agreed with the Local Highway Authority and removal of traffic islands to facilitate the required Abnormal Indivisible Load (AIL) vehicle movements. Temporary traffic islands will be provided between AIL movements.
12.117	Suffolk County Council	<i>A1071-A1214 junction to JC-B006</i> Between the A1214 junction and the roundabout with the B1113 are two signalised junctions, one to the south approximately 120m from the A1214 junction and one to the north approximately 300m from the roundabout. After this second junction the road travels over the A14, which is important to note as this is an AIL route for both the mobile crane and the transformer. There is a footway running along the north of the road.	The structure proposed to be crossed by Abnormal Indivisible Loads (AILs) over the A14 has been confirmed by Suffolk County Council as a National Highways structure. The Applicant has consulted with National Highways on the proposed AIL delivery routes, with no concerns identified to-date regarding this structure. The Contractor is working to confirm the routes and will continue engagement with National Highways.
12.118	Suffolk County Council	<i>A1071-A1214 junction to JC-B006</i> Following the B1113 roundabout the road becomes rural and, as stated above, mostly straight until Hurdle Makers Hill. There is no footway, however there are several bus stops and public rights of way on both sides of the roads	The Applicant notes this comment. The description of the road characteristics including the provision for walking and cycling and the connection with public rights of way has been considered for the assessment in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. Details of the baseline conditions can be found in 6.16.A2 Environmental Statement Appendix 16.2 - Traffic and Transport Baseline Conditions [APP-273].

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12.119	Suffolk County Council	<i>B1070 – A12 junction to JC-B022</i> The slips on and off the A12 in this location are very short, however these fall under the jurisdiction of National Highways. The ownership of Suffolk County Council starts approximately 45m from the junction with the A12. At this point the road is narrow and loops to the northwest before joining the main road. A footway runs on the south side of the road approximately 75m east of the junction, before then crossing over at the junction with the use of a pedestrian island. The footway then runs along the eastern side of the road and is not separated from the carriageway.	The Applicant notes this comment. The description of the road characteristics including the provision for walking and cycling has been considered for the assessment in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. Details of the baseline conditions can be found in 6.16.A2 Environmental Statement Appendix 16.2 - Traffic and Transport Baseline Conditions [APP-273].
12.121	Suffolk County Council	<i>AIL Specific Roads - B1113 – A1071 junction to Bullen Lane</i> From the junction with the A1071 it is 40mph and has a 7.5 tonne weight limit (except for loading). The speed limit becomes 30mph south of Sproughton and continues through the village, becoming 40mph again at the northern end.	The environmental weight limit through Sproughton has been brought to the attention of the Applicant by Suffolk County Council through previous engagement regarding this route. The Contractor / haulage specialist will liaise with Suffolk County Council to seek necessary lifting of the restriction to enable Abnormal Indivisible Load access in line with the finalised schedule of movements.
12.122	Suffolk County Council	<i>AIL Specific Roads - B1113 – A1071 junction to Bullen Lane</i> The road through Sproughton in particular is narrow, which is made worse by a large number of vehicles parking along both sides of the road. There are numerous dwellings with private accesses along this road, plus footways along the length of the village with scattered crossing points for pedestrians.	The B1113 through Sproughton has been assessed including vehicle tracking for the design Abnormal Indivisible Load (AIL) vehicles. Mitigation measures are proposed at several locations to accommodate these vehicle movements, including temporary removal of street furniture, traffic management as agreed by the Local Highway Authority, removal of traffic islands with temporary islands provided between AIL movements, and temporary suspension of street parking. These are shown in 7.3 Outline Construction Traffic Management Plan Appendix C

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			– Indicative Highway Mitigation Plans – Section C [APP-315].
12.123	Suffolk County Council	<i>B1113 – A1071 junction to Bullen Lane</i> It is important to note that this is the same proposed route for the Bramford to Twinstead AIL transformer delivery, which has been met with opposition from residents of Sproughton.	The Applicant acknowledges the sensitivity around transporting abnormal loads through Sproughton. Alternative routeing of the Transformer delivery Abnormal Indivisible Load (AIL) via the A14 Junction 52 exit (Claydon) was discounted due to feedback received from Suffolk County Council that structures along the B1113 Bramford Road / Loraine Way are unsuitable for this vehicle. Therefore, Transformer delivery AIL routeing proposed through Sproughton is considered the only feasible option This is noted in 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]. It should be noted that the Mobile Crane AIL is proposed to travel along the Primary Access Route via A14 Junction 52 (Claydon) to minimise AIL traffic through Sproughton where possible.
12.124	Suffolk County Council	<i>Port of Ipswich to A14</i> Any AILs leaving the western dock of the Port of Ipswich to access the A14 need to be aware of the bridge known as Ostrich Creek. This bridge has a weight restriction for special order movements and requires overbridging for AILs, which causes significant disruption to the highway network, especially as this is a key route into Ipswich.	The Applicant is aware of Ostrich Creek Bridge and associated overbridging through engagement to-date. As noted in 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310] the Contractor will work to source materials and equipment which will help to inform the logistics and routeing of the abnormal load deliveries which are required, including the Ports of origin for such routes. Once Abnormal Indivisible Load delivery routes have been fully assessed, the Contractor will re-engage with the relevant stakeholders.
12.125	Suffolk County Council	<i>Port of Ipswich to A14</i>	The Applicant is aware of Orwell Bridge. As noted in 7.3 Outline Construction Traffic Management Plan

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		ALLs leaving the eastern dock are required to travel through the town, which causes disruption to local traffic and pedestrians. This will also require a significant amount of street furniture being taken down and re-erected, and also crossing of the Orwell Bridge which comes under the purview of National Highways.	Appendix A - AIL Access Strategy [APP-310] the Contractor will work to source materials and equipment which will help to inform the logistics and routing of the abnormal load deliveries which are required, including the Ports of origin for such routes. Once Abnormal Indivisible Load delivery routes have been fully assessed, the Contractor will re-engage with the relevant stakeholders.
12.126	Suffolk County Council	<i>Port of Ipswich to A14</i> Both of these routes are fully urban in their nature with heavy traffic flows, high pedestrian and high cycle usage	The Applicant notes this comment. The routes from the Port of Ipswich to the A14 via the Ostrich Creek bridge or via Orwell Bridge do not form part of the Primary Access Routes and therefore have not been assessed within the 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271], as per 6.20 Scoping Opinion [APP-297].
12.127	Suffolk County Council	<i>Port of Ipswich to A14</i> Liaison with National Highways is required with these loads as SCC does not have jurisdiction of the A14 and as such cannot comment on this road.	The Applicant has engaged with National Highways on the proposed Abnormal Indivisible Load delivery routes. The Contractor is working to confirm the routes and will continue this engagement.
12.128	Suffolk County Council	<i>A140 – A14 junction to A143 junction</i> Whilst this road has not been specifically identified as being a construction route, it is highly probable that construction traffic and mobile crane ALLs will be using it to access the project as it is the main spinal road between Ipswich and Norwich and runs roughly parallel to the project.	The Applicant notes this comment. The A140 between A14 junction and A143 junction forms part of the Major Road Network that provides access to the Primary Access Roads. It was therefore not included in the AIL routing assessment or within the assessment undertaken within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. The forecast percentage increases of traffic flows on the A140 between A14 junction and A143 junction has been assessed in Section 7.6 of the 7.11 Transport Assessment [APP-333]. The results of the modelling

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			of Site 35 A140 Stoke Ash are detailed in Section 7.7 of the 7.11 Transport Assessment [APP-333] .
12.129	Suffolk County Council	<i>A140 – A14 junction to A143 junction</i> The road is mostly straight with a variety of speed limits, the main being 50mph. The villages the road passes through have a limit of 30mph. There are dwellings, businesses and local road junctions along the length of the road on both sides. Footways are located alongside the road in several locations, however there are no formal crossing points.	The Applicant notes this comment. The A140 between A14 junction and A143 junction has not been assessed within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] , as this road forms part of the Major Road Network.
12.130	Suffolk County Council	<i>A140 – A14 junction to A143 junction</i> Important locations to note along this road are: i. Brockford bridge. This has a weight restriction for heavy AILs and requires overbridging for AILs passing over. This causes significant delays to traffic and has knock on effects to the local roads as drivers try to find routes around. ii. Stoke Ash crossroads. There are already significant driver delays at this crossroads, in particular turning out of Workhouse Road onto the A140. Increased construction traffic will cause more anxiety and driver delay at this crossroads, and could lead to serious accidents as drivers become impatient. iii. A1120 crossroads. This location is very similar to the Stoke Ash crossroads in that there is significant driver delay for vehicles turning onto the A140.	iv. As noted by Suffolk County Council, this route is not currently proposed for Abnormal Indivisible Load (AIL) movements. If the Contractor were to determine that this route was needed, surveys would be carried out by the appointed Contractor/haulage specialist to assess feasibility of AIL routes prior to submission of the Electronic Service Delivery for Abnormal Loads (ESDAL) application. v. The Applicant has been discussing with Suffolk County Council the existing road safety and driver frustration concerns at the A140/A143 Stoke Ash junction and potential solutions. The Applicant considers that the level of mitigation required at the junction to resolve the existing (historic) safety issues goes beyond what is reasonable and proportionate to mitigate for a temporary Project with short-term effects, which would have limited impact on driver delay as the duration of the peak is expected to be of one week. The Applicant has

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			and will continue to engage with Suffolk County Council on this matter. vi. The A1120 crossroads junction was not specifically raised by Suffolk County Council as requiring assessment and as identified, the A140 is part of the Major Road Network and as such an assessment of the junction has not been included within the 7.11 Transport Assessment [APP-333] as set out in 6.20 Environmental Statement Scoping Opinion [APP-297].
12.131	Suffolk County Council	<i>Sustainable Transport</i> On the B class roads provision of footways is at best intermittent and usually absent as are crossings, even informal ones comprising just dropped kerbs. This creates isolation and severance between and within communities if traffic increases.	The construction effects for all B class roads that form Primary Access Routes (PARs) for the Project have been assessed within the 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] for pedestrian, cyclist and horse-rider severance and amenity. This takes into consideration sensitive receptors and provision for these users. Within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] no significant effects were identified taking account of additional mitigation such as PAR 12 - B1113 Finningham Rd/B1113 Walsham Road where we are proposing provide information within the driver information pack of locations where pedestrians cross the carriageway or could be walking on carriageway, cutting back vegetation and maintenance of verges, improve existing advanced warning signage, notices on Public Right of Way access and surface colouring under 'SLOW' markings. Details can be found within 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]

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12.132	Suffolk County Council	<i>Sustainable Transport</i> North of Stowmarket the pylon route crosses open countryside where there are very few footways alongside roads, however there are numerous PRowS along this route. PRow often start and finish at roads. Where they cross the road, this is not always immediately opposite each other and hence some use of the road network by walkers is necessary to rejoin the PRow.	North of Stowmarket the majority of Public Rights of Way (PRowS) provide direct connection across the PAR 16 - A1120 Church Road/A1120 Bell's Lane. Two locations have been identified where this is not the case. Footpath W-499/052/0 connects to the PAR 16 to Creting Lane. At this location there is a footway on the northern side of the carriageway. From the environmental assessment on pedestrian, cyclist and horse-rider severance and amenity in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271], there were no significant effects identified after mitigation has been proposed as set out in 7.3 Outline Construction Traffic Management Plan [APP-309]. As detailed in 12.104, footpath W-209/006/0 connects to A1120 Bell's Lane which is not a Primary Access Route. However, users may travel westbound towards footpaths W-499/015/0 and W-499/016/0. Between these PRowS, only a distance of approximately 110 m along PAR 16 - A1120 Church Road/A1120 Bell's Lane would be used by users connecting these PRowS. At this location peak hour movements have been avoided as discussed with Suffolk County Council, and it is anticipated that there will be a total of 28 HGV movements per hour. Although during off-peak periods it is unlikely there will be an interaction between pedestrians walking along the PAR and there are alternative routes available, this location can be included within the driver information pack prepared as mitigation as set out in 7.3 Outline Construction Traffic Management Plan [APP-309].

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			The Applicant will continue to engage with Suffolk County Council on this matter.
12.136	Suffolk County Council	<i>Network Resilience</i> The Councils have raised concerns regarding the resilience of the highway network. The proposals rely on the A140 and A143 as the HGV routes, and many will also use the A14 to access. The main issues for network resilience on account of the proposed project are: Closure of the A14 Orwell Bridge due to collisions or high winds resulting in traffic being diverted through Ipswich, i. Closure of the A14 or the A12 (north and south of the A14) and lack of suitable diversions, ii. Capacity of junctions on the strategic road network, particularly if delivery of multiple NSIPs coincide, iii. Delays on the Major Road Network due to increased volume of traffic. iv. Restrictions placed on the ability to maintain the highway network during normal working hours due to the higher volume of construction movements, Lack of laybys or other suitable parking, rest, or stopover facilities east of the A140 and A143. The concerns raised at previous examinations have been experienced with complaints from local residents about antisocial use of laybys and from hauliers regarding lack of areas to take legal breaks.	Significant volumes of construction traffic are not anticipated to make use of the A14 Orwell Bridge. As set out in 7.11 Transport Assessment [APP-333], including 7.11 Transport Assessment – Appendix I – Figures [APP-342], significant deliveries of construction materials are not anticipated to be delivered from sources to the east of the River Orwell. As noted in 7.3 Outline Construction Traffic Management Plan – Appendix A – AIL Strategy [APP-310], use of the Orwell Bridge is under consideration specifically for the delivery of Abnormal Indivisible Loads (AILs). Deliveries of these items would take place utilising approved routes, and including coordination with appropriate teams from Suffolk County Council, National Highways, and Suffolk Constabulary. 7.3 Outline Construction Traffic Management Plan [APP-309] sets out how contingency routes will be considered in the event of any incident occurring which impacts on the safe and efficient operation of the road network. Contingency routes will be provided by pre-established traffic diversions and diversions as set out by National Highways, the relevant highway authorities and the police. 7.3 Outline Construction Traffic Management Plan – Appendix A – AIL Strategy [APP-310] sets out the proposed approach for the management of AILs in the event of a route becoming unavailable, and that these will not be permitted to travel along routes which have not been appropriately approved.

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			All relevant and known developments, including Nationally Significant Infrastructure Projects (NSIPs), that might impact the junctions connecting the Primary Access Routes (PARs) to the Strategic Road Network/Major Road Network were identified and considered in the 7.11 Transport Assessment - Appendix D - Committed Developments [APP-337]. For Suffolk County Council, NSIPs reviewed were the Bramford to Twinstead Reinforcement – Overhead Transition Lines project, Sizewell C, East Anglia One and Two North Offshore Wind farms, East Anglia Three (Tye Lane Bramford Suffolk), Sunnica Solar Farm near Newmarket, and Sea Link Project. This includes all relevant NSIPS identified for Strategic Road Network junctions. 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 / NSIPs. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement then these would be published into Examination. The A140 forms part of the Major Road Network that provides access to the Primary Access Roads. 7.11 Transport Assessment [APP-333] assessed the forecast percentage increases of traffic flows on the A140 at the request of Suffolk County Council. It was found that there would be an increase of 35% of HGVs and a maximum increase of less than 10% for total traffic in the AM and PM peak hours, which is deemed to be not significant for a road forming part of the Major Road Network which appears to operate generally

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			under free-flow conditions with low congestion as identified from Google Traffic typical conditions. Therefore, no significant delays are expected. One junction on the A140 was identified by Suffolk County Council to be included within the modelling assessments. Site 35 Stoke Ash junction was modelled during the AM and PM peak hour and no significant delay was identified on the A140. The Applicant has and will continue to engage with Suffolk County Council on this matter. The Applicant has developed 7.3 Outline Construction Traffic Management Plan [APP-309], which sets out the proposed approach to monitoring and maintenance of the public highway on routes impacted by construction traffic, which includes the undertaking of pre- and post-condition surveys, with remedial works to be agreed with relevant highway authorities. This document also sets out anticipated hours for HGV deliveries, with the caveat that certain specified activities which may be undertaken outside of these core hours, which includes the undertaking of highway works requested by the highway authority. The Applicant and any appointed Main Works Contractor(s) will continue to engage with Suffolk County Council with respect to monitoring and any required remedial works relating to the Public Highways. A detailed Construction Traffic Management Plan will be developed and approved by Suffolk County Council post consent under Requirement 4 of Schedule 3 of the 3.1 Draft Development Consent Order [APP-056]. This will include further details of measures for Heavy Goods Vehicle (HGV) drivers to have

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			appropriate breaks by utilising fully equipped service stations where appropriate. HGV drivers will also be encouraged to use welfare facilities on-site rather than local facilities within Suffolk. The measures in the 7.3 Outline Construction Traffic Management Plan [APP-309] are considered suitable to address the concerns which Suffolk County Council have raised.
12.137	Suffolk County Council	<i>Network Resilience</i> It is forecast that the HGV movements associated with Norwich to Tilbury will peak at around 440 in August 2028, as shown in Image A16.4.20 of Document: 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275], however it is not clear if this number is for one way or two way movements.	Image A16.4.20 in the 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] presents the construction traffic flows for the daily (07:00-19:00) two-way movements (arrivals and departures).
12.138	Suffolk County Council	<i>Network Management</i> Impacts on network management during the construction phase will include: i. The intended DCO powers in article 11 may inhibit the authority in performing its duties as the local highway authority by removing control on the highway within the 'works' or associated with implementation of the traffic regulations in article 49. ii. The presence of construction traffic on the network for 7 days a week will hamper routine highway maintenance or increase delays and disruption. The authority may also incur increase costs if forced for operational or safety reasons to undertake more work outside normal working	The Applicant has developed 7.3 Outline Construction Traffic Management Plan [APP-309] , which sets out the proposed approach to monitoring and maintenance of the public highway on routes impacted by construction traffic, which includes the undertaking of pre- and post-condition surveys, with remedial works to be agreed with relevant highway authorities. This document also sets out anticipated hours for HGV deliveries, with the caveat that certain specified activities may be undertaken outside of these core hours, which includes the undertaking of highway works requested by the highway authority. The Applicant and any appointed Main Works Contractor(s) will continue to engage with Suffolk County Council with respect to monitoring and any required remedial works relating to the Public Highways.

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		hours. Whilst HGV movements are restricted in Requirement 7 it should be made clear this is for two way movements not just for deliveries.	Requirement 7 of the 3.1 Draft Development Consent Order [APP-056] details that ‘Subject to subparagraphs (4) and (5), no HGV deliveries may be made to site outside of the hours of 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays, unless otherwise approved by the relevant highway authority’. HGV movements to site are intended to be deliveries, unless associated with material removal. HGVs will not remain on site from a delivery, as a result every delivery is a two-way movement. The 7.3 Outline Construction Traffic Management Plan [APP-309] states that construction traffic operating outside of the agreed hours is a matter of non-compliance. Therefore, all HGV movements on the primary access routes are controlled by the Construction Traffic Management Plan irrespective of whether they are delivering material to or from site.
12.139	Suffolk County Council	<i>Road users</i> Key issues facing road users include: Delay to public transport and other road users including emergency services and public services. i. Safety, fear, intimidation and severance as constriction traffic impacts pedestrians and cyclists where provision of sustainable transport infrastructure or alternatives and limited. ii. Loss of amenity both on rights of way but also highways used to link or access these. iii. Lack of breaks in construction with seven days a week working	i. The Applicant has assessed driver delay and public transport delay to passengers in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. Overall, the significance of effects was deemed to be slight and not significant apart from PAR 23 – A1071 where a moderate effect was identified. Details can be found within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. It is understood that the junctions along this Primary Access Route (PAR) suffer from congestion and are to be upgraded as part of the planning application Land North of the A1071, Ipswich (Wolsey Grange) Ref DC/21/02671 granted in 2023 which will

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			accommodate the committed development flows and the construction traffic from the Project without significant capacity issues. ii. The Applicant has assessed pedestrian, cyclist and horse-rider severance, amenity and fear and intimidation in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. It was found that the significance of effects is considered to be neutral or slight on all PARs within Suffolk. Details can be found within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. The assessment has identified PARs where the significance of effects on pedestrians and cyclists is large or moderate adverse for a short-term period (e.g. Link PAR 12 - B1113 Finningham), and additional mitigation has been proposed to reduce the residual effects. Mitigation includes the driver information pack to identify locations where pedestrians/ cyclists cross the carriageway or could be walking either on verge or carriageway along the PAR and warning signage. Cutting or maintenance of vegetation is also proposed adjacent to the PARs where required to ensure adequate space for pedestrians/cyclists. iii. The Applicant has assessed pedestrian, cyclist and horse-rider delay on the Public Rights of Way (PRoWs) and amenity on the road links that connect the PRoWs. It was found that the significance of effects is considered to be neutral or slight on all PRoWs within Suffolk. Details can be found within 6.16.A4 Environmental Statement

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			Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. The Applicant recognises that there will be significant effects on visual receptors at locations along the length of the Project, and extending to some distance from it, as explained within the assessment presented in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The visual assessment takes into consideration the visual effects of the Project on people using P_{Ro}Ws and the road network. The effects on views will affect a sequence of places along the length of the line, with the effects being described in relation to each of the assessment units; in this case Visual Receptor Areas (VRAs), supported by a viewpoint assessment. The assessment of visual effects on each VRA is presented in 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The viewpoint assessment is presented in Annex A of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232]. A number of viewpoints were considered from P_{Ro}W and roads within Suffolk such as viewpoint 3.30 set out on pdf page 160 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230] and viewpoint 3.08 set out on pdf page 107 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230]. Following the implementation of embedded and standard mitigation, 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] identifies significant adverse residual effects on visual

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			receptors in close to medium views of construction works during construction. During operation there will be significant adverse residual effects on visual receptors up to approximately 2 km from the above ground 400 kV overhead line element of the Project. iv. The Applicant has developed 7.3 Outline Construction Traffic Management Plan [APP-309] which outlines the approach to managing the construction traffic impacts. All staff and operatives working on the Project will undergo a site-specific induction, which will include the provision of a driver information management pack. The driver information pack will include information on nearby pedestrian crossings and locations where pedestrians or equestrians may be in the highway alongside the appropriate actions. It is anticipated that the Main Works Contractor(s) will develop an incident management plan in agreement with the blue light services. The blue light services will be given written notices of planned lane or road closures and Abnormal Indivisible Load deliveries. Additional information on the blue light services is detailed in Section 5.10 of the 7.3 Outline Construction Traffic Management Plan [APP-309].
12.140	Suffolk County Council	<i>Route Selection</i> SCC is concerned that the applicant has not yet completed an assessment of potential access routes to the substation and convertor station but acknowledges that they are working with SCC to do so.	The Project proposals include two sites requiring constructed operational accesses in Suffolk: Bramford Substation, and the proposed Wenham Grove Cable Sealing End (CSE) Compound. These are described in 6.4 Environmental Statement Chapter 4 – Project Description [APP-130] and are further shown in 6.4.F2 Environmental Statement Figure 4.2 –

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			Proposed Project Design – Permanent Features [APP-134] (Section B Page 26, and Section C Page 28, respectively). The reference by Suffolk County Council to a ‘converter station’ is ambiguous with respect to these proposals, though in the context are inferred to be in reference to the Wenham Grove CSE Compound. In an operational context, access to these locations is proposed to be provided as follows: i. For Bramford Substation, operational traffic will continue to utilise the existing National Grid site access point from Bullen Lane ii. For the proposed Wenham Grove CSE Compound, operational traffic will utilise a proposed permanent access point on Raydon Road, denoted as ‘JC-B013’ in 6.4.F2 Environmental Statement Figure 4.2 – Proposed Project Design – Permanent Features [APP-134] (Section C Page 28). From these points, it is anticipated that operational traffic will utilise appropriate local road and/or Strategic Road Network links for movements required, considering vehicle types, movement quantities, and trip origins. As set out in 6.20 Scoping Opinion [APP-297], operational traffic associated with the Proposed Development is unlikely to result in significant effects, and has therefore been excluded from the scope of further assessment. With respect to access for the construction of these locations, proposed Primary Access Routes (PARs) would be utilised, in line with the strategy for construction access set out in 7.3 Outline Construction Traffic Management Plan [APP-309].

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			For construction of works in the vicinity of Bramford Substation, PAR assigned in Table 5.1 of the Construction Traffic Management Plan is H10-A2 (shown in 7.3 Outline Construction Traffic Management Plan - Appendix C – Indicative Highway Mitigation Plans – Section B [APP-314] Sheets 8 and 9), and for Wenham Grove CSE Compound Table 5.1 assigns H12-A2 (shown in 7.3 Outline Construction Traffic Management Plan - Appendix C – Indicative Highway Mitigation Plans – Section C [APP-315] Sheet 6), noting that the reference ‘CSEC-JC-01’ in this context denotes the proposed Wenham Grove CSE Compound.
12.141	Suffolk County Council	<i>Site Access Points</i> Whist generic accesses are shown in the Design and Layout Plans no topographic surveys have been undertaken to show that the 2-D layouts work in practice, for example the vertical alignment of the existing highway does not compromise visibility or not features such as service would hinder construction. The highway boundary should be clearly shown as should any land proposed as highway to be adopted by the authority.	Preliminary designs of each of the proposed Site Access Points and Site Crossover points have been developed and represent adapted versions of the indicative 2.6.3 Design and Layout Plans – Traffic and Transport [APP-043]. The design of each of the proposed Site Access Points and Site Crossover Points is based on site specific data and considerations which consider both Design Manual for Roads and Bridges design standards, and the anticipated design vehicles using these access and crossover points. Site specific requirements have utilised high density LiDAR data to verify vertical constraints to the junctions and their visibility splays, and where identified, the Order Limits have been refined to accommodate potential works to mitigate 3D constraints. This includes allowance for earthworks and drainage. This level of design is considered appropriate for preliminary designs.

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			Topographic survey will be used by the Main Works Contractor to inform the detailed design. Detailed designs will also show the highway boundary and any land proposed to be adopted by the Local Highway Authority.
12.142	Suffolk County Council	<i>Site Access Points</i> The visibility splays are likely to require removal or coppicing of vegetation to achieve. SCC's preference is for the latter for temporary accesses subject to suitable maintenance by the applicant.	The Applicant notes SCC's preference for coppicing of vegetation. During detailed design (post-consent) the Contractor will further develop the design, and it is anticipated that the amount of vegetation loss would be reduced and impacts to trees and hedgerows will be minimised as far as practicable. 7.4 Outline Landscape and Ecological Management Plan (Revision C) and 7.2 Outline Code of Construction Practice (Revision B) both include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts to habitats including trees and hedgerows, where practicable as tree canopy lifting may be achievable and meet with Highways approval.
12.143	Suffolk County Council	<i>Site Access Points</i> The Applicant has assumed that where speed limits are present vehicles comply with these and hence are appropriate for design purposes. Experience has shown that this is not always the case and where reduced speed limits are used for design purposed this should be supported by survey data or physical measures showing it is effective.	Speed limits represent one of a number of measures that have been proposed, or are available to the Applicant to manage the safety of the existing public highway at interactions with the proposed works. A suite of temporary traffic management measures is specified within the 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310] and if appropriate, will be utilised by the contractor to support the implementation of speed limit reductions. The Applicant has carried out traffic surveys in locations proposed for Site Access Points and Site Crossover Points. This has included obtaining 85th

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			percentile speed data to understand the existing conditions, which forms part of the data that has informed the design of these junctions and their associated visibility splays.
12.144	Suffolk County Council	<i>Junction Capacity</i> The LHA considers that the following are significant junction within the applicant's study area. A140 – Stoke Ash Crossroads i. A140 / A143 roundabout ii. A1214 / A14 roundabout at Copdock	The Applicant notes this comment. These junctions have been identified as likely to be impacted by the Project's construction traffic and other committed developments as assessed within 7.11 Transport Assessment [APP-333]. At A140 – Stoke Ash Crossroads (Site 35) the junction would operate within capacity with slight increase in delay on the side roads. No mitigation has been proposed. At A140 / A143 roundabout (Site 16) a small increase in RFC values in the AM peak hour as a result of the Project traffic was identified. However, this would be over a short duration and no mitigation has been proposed. Mitigation at A1214 / A14 Copdock Interchange (Site 29) has been proposed as set out within 7.3. Outline Construction Traffic Management Plan [APP-309].
12.147	Suffolk County Council	<i>Abnormal Indivisible Loads</i> SCC understands that details of the AIL movements remains to be confirmed but are assumed to comprise of: Cable drum movements (will require police escort) i. Transformers (will require police escort) ii. Other AILs likely to be cranes, piling rigs. No dimensions given at this stage and not clear if they will require an escort	iii.) The Applicant has provided details of the anticipated Abnormal Indivisible Load (AIL) vehicles in 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]. These are driven by the type of works to be undertaken and associated equipment requiring transportation via AIL delivery: Large mobile crane (for overhead line construction) i. Cable drum delivery vehicle (for underground cabling works)

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		iii. Port not yet confirmed but anticipated to be Ipswich or Harwich	ii. Transformer delivery vehicle (for substation works) iii. Horizontal directional drilling (HDD) rig (for underground cabling works) iv. Piling rig (for overhead line construction, underground cabling works and substation works). Indicative dimensions for all of the vehicles listed above are also noted in 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]. Options for the Port of origin for AIL deliveries are being considered by the Contractor/their haulage specialist. Once AIL delivery routes have been confirmed, the Contractor will re-engage with the relevant stakeholders.
12.148	Suffolk County Council	<i>Abnormal Indivisible Loads</i> The overarching National Policy Statement for Energy (EN-1) identifies Traffic & Transport, including abnormal loads generated during the construction phase, as an impact where the Secretary of State recognises the need for appropriate mitigation to ensure satisfactory arrangements in consultation with network providers and the responsible police force. SCC expects this principle to be reflected in the identification and securing of appropriate developer funded highway and police resources.	Noted. The Applicant notes Suffolk County Council's comments and is considering the request made by Suffolk County Council and the Suffolk Constabulary, whilst mindful of its regulatory duties.
12.150	Suffolk County Council	<i>Abnormal Indivisible Loads</i> Thus, NSIP developments create heightened demand for police escorted Abnormal Indivisible Loads (AILs) during construction. Suffolk Constabulary does not have a dedicated AIL team, and escorts are currently provided on an overtime basis when capacity allows.	The Applicant notes Suffolk County Council's comments. The Applicant is working closely with Suffolk Constabulary to confirm the number of AILs on the public highway that may require escort during the Project's construction, as well as any associated additional policing needs and lead-in times.

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		Therefore, where sustained demand is identified a bespoke solution - such as a dedicated AIL team - may be necessary, subject to appropriate lead-in time and developer funding.	To date the Applicant has shared with Suffolk Constabulary proposed AIL routes, indicative volumes of AIL movements and indicative programme dates. The Applicant has held regular meetings with the Suffolk Constabulary and will continue to engage to agree on the most appropriate and effective way to address the anticipated demand for AIL escorts, see 8.3.3. Statement of Common Ground Suffolk Constabulary [REP1-073] for further details.
12.151	Suffolk County Council	<i>Abnormal Indivisible Loads</i> AIL special order routes from the Strategic Road Network or port to the site must be surveyed to prove there is a viable route to the converter station and substation. Reliance on the ESDAL notification system may result in loads being refused, for example if a highway structure has an STGO or Special-Order weight restriction.	Surveys will be carried out by the appointed Contractor/haulage specialist to assess feasibility of AIL routes prior to submission of the ESDAL application.
12.153	Suffolk County Council	<i>Abnormal Indivisible Loads</i> Despite advice provided to the Applicant by SCC no assessment has been undertaken on the capacity of structures to carry the special-order loads between the SRN or a port and the site.	The Applicant has undertaken assessments of structures along the proposed routes using record data provided by Suffolk County Council and other Local Highway Authorities. These assessments will be continued by the Contractor. Where issues have been identified, the Contractor is considering appropriate mitigation and will continue engagement with the relevant stakeholders.
12.154	Suffolk County Council	<i>Abnormal Indivisible Loads</i> Work undertaken by SZC has resulted in restrictions being placed on structures along the A140 corridor between A140/A14 Beacon Hill Interchange and A140/A143 Stuston Roundabout.	The Applicant appreciates this information being raised. The Contractor will liaise with the relevant stakeholders to assess routes and structures appropriately as part of managing access for the Large Mobile Crane AIL. Cable Drum and Transformer AILs are not proposed along this section of the A140.

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12.156	Suffolk County Council	<i>Abnormal Indivisible Loads</i> SCC expects the Applicant to work in partnership with other developers during the structural review and commit to assisting with long term maintenance of AIL routes to energy sites in Suffolk	The Applicant notes Suffolk County Council's comments and is considering the request made by Suffolk County Council relating to long-term maintenance, whilst mindful of its regulatory duties and that National Grid is one of a number of developers making use of highway infrastructure in the area.
12.157	Suffolk County Council	<i>Abnormal Indivisible Loads</i> The Councils note that the by scoping out all transport issues from the operational and decommissioning phases, the Applicant considers that it is unlikely that any future special-order movements will be required after completion. The Councils consider that this is unwise and does not consider movements required, particularly during decommissioning.	Decommissioning effects were scoped out of the Environmental Statement (Volume 6 of the application for development consent), as per 6.20 Scoping Opinion [APP-297]. Table 4.12 in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] summarises the assessment of likely significant effects from decommissioning. As noted in paragraph 2.3.28 of the 7.3 Outline Construction Traffic Management Plan Appendix A – Abnormal Indivisible Load (AIL) Access Strategy [APP-310], access to substations is required for construction, operation and maintenance, with a permanent access route to be provided to enable 24/7 access. Where special-order movements are required following completion of the construction, the standard procedure will be followed. This will include engagement with the Local Highway Authorities, and use of the ESDAL system. Requirement 13 in Schedule 3 to the 3.1 Draft Development Consent Order [APP-056] sets out that: <i>'In the event that, at some future date, the authorised development, or part of it, is to be decommissioned, a written scheme of decommissioning must be submitted to the relevant planning authority for its approval in</i>

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			<i>consultation with the relevant highway authority, at least six months prior to decommissioning works.'</i> At the time of decommissioning the Applicant will engage with all relevant stakeholders and affected landowners implementing the necessary management plans, permissions, permits, etc. required at that moment in time
12.159	Suffolk County Council	Typically, throughout Suffolk the local roads connect nodes of settlement resulting in significant differences to the character of the highway, for example sections of open road with few junctions, dwellings or businesses between clusters of houses. Services such as schools and community centres are located off, but close to, routes but away from parts of the settlement proposed for construction traffic requiring local residents to cross these routes.	The adequacy in the provision of footways and crossings has been considered in the assessment of pedestrian, cyclist and horse-rider severance, amenity and fear and intimidation, specifically in relation to the sensitivity of the Primary Access Routes. Where the assessment has identified a significant effect, appropriate mitigation measures have been proposed.
12.162	Suffolk County Council	<i>Diversion Routes</i> The diversion routes in 2.5 Access Rights of Way and Public Rights and Navigation Plans [APP-034] and [APP-035] have not been agreed with the Highway Authority. Some, such as diversion onto Wickham Lane, Wickham is unsuitable due to the acute angle of vehicles turning into and out of Wickham Lane, in addition to the fact that Wickham Lane is not the same road category as Wickham Road.	The Applicant acknowledges that the specific diversion routes may not have all been agreed with the Highway Authority. However, the design approach taken has to been to identify equivalent or better routes where available. The Applicant continues to engage on this matter with the Local Highway Authority. The diversion route onto Wickham Lane has been reviewed, and an alternative diversion route could be considered by the Applicant and their Main Works Contractor through further engagement with the Local Highway Authority as the traffic management measures and Traffic Regulation Order proposals are further developed. It should be noted that the requirement to close the road would only be in the worst-case scenario where

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			the Contractor's phasing of works requires it. Ordinarily any works in or over the public highway could be undertaken and managed safely through local short term Traffic Management.
12.167	Suffolk County Council	<i>Intra-project cumulative effects</i> The following PAR links have been considered by the applicant to have a Moderate Adverse effect on non-motorised users, however no mitigation has been suggested: Link PAR 11 - Lion Road i. Link PAR 13 - Wickham Road ii. Link PAR 16 - A1120 Church Road / A1120 Bell's Lane iii. Link PAR 20 - B1113 Bramford Road / B1113 Loraine Way iv. Link PAR 24 - B1070 (A12 access) v. Link PAR27 - Birchwood Road vi. Link PAR28 - Wick Road / Grove Hill vii. Link PAR33 - Old Ipswich Road viii. Link PAR34 - Turnpike Close	Significance of effect has been derived by considering the sensitivity (or value) of the receptors within the Study Area, and the magnitude of change (impact) likely to be caused by the activities of the Project. These factors are combined to give an overall significance of effect. Methodology can be found within Section 16.4 of the 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. The assessment of significance of effects for pedestrians, cyclists and horse-riders is presented within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. Although the magnitude of effects identified for Primary Access Routes (PARs) may be identified as moderate or major, when assessed against the sensitivity of the links the overall significance of effects is found to be slight in the PARs listed by Suffolk County Council. A summary for these PARs can be found within Table A16.4.8 in 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. We note that PAR 27, PAR 28, PAR 33 and PAR 34 are located in Essex.
12.171	Suffolk County Council	<i>Inter-project cumulative effects</i> Experience from data with SZC and EA2 is that significant pressure is being put on the capacity of laybys and rest areas for HGVs leading to complaints	6.4 Environmental Statement Chapter 4 – Project Description [APP-130] provides details of the welfare facilities proposed for the Project. Welfare facilities are proposed to be facilitated at Main Works Compounds (Overhead Line), Satellite Compounds (Overhead

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		from both local residents and hauliers. There is a shortage of welfare facilities for HGV drivers, and the Applicant is strongly recommended to provide such facilities and parking for legal breaks at all large site compounds.	Line), Primary Compounds (underground cable) and Highway Mitigation Compounds. It is expected that these welfare facilities will be available to HGV drivers. Construction traffic to be generated by the Project and its routing has been assessed and where any significant effects have been identified on the surrounding highway network, mitigation measures are proposed within the 7.3 Outline Construction Traffic Management Plan [APP-309] or are under discussion with the relevant highway authority. A detailed Construction Traffic Management Plan (CTMP) will be developed and approved by Suffolk County Council post consent under Requirement 4 of Schedule 3 of the 3.1 Draft Development Consent Order [APP-056] . This will include further details of measures for Heavy Goods Vehicle (HGV) drivers to have appropriate breaks by utilising fully equipped service stations where appropriate. HGV drivers will also be encouraged to use welfare facilities on-site rather than local facilities within Suffolk. Whilst this cannot be fully prevented given that HGV drivers have a legal requirement to take a certain number of breaks/rests as part of their journey, it is not expected that stopover/rest facilities in Suffolk will be significantly impacted. Hauliers will have the opportunity to utilise stopover/rest facilities along any part of their route and are more likely to utilise welfare/rest facilities a few hours away from site, given that they could just continue their journey a short distance to the site construction compounds where they will have their own access to welfare facilities. Again, the detailed CTMP will include measures to encourage HGV drivers to use welfare facilities on-site

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12.173	Suffolk County Council	<i>Inter-project cumulative effects</i> The proposed project, in combination with Bramford to Twinstead and proposed NSIPs, will: result in a significant increase in HGV movements on the A140 and A143 i. exacerbate pre-existing issues along the A140 route. ii. increase HGV movements resulting in increased delay and reduced residual capacity on the A140, A143 , A1214 and A1120. iii. increase HGV movements along the A140 and A143, reducing the attractiveness of the route for users of sustainable transport, particularly cycling, as well as increasing severance in communities along the route. iv. reduce the attractiveness of core strategic routes, such as the 140, A1120 and A143, due to delays and longer journey times causing local traffic to switch to minor, less suitable roads. v. increase wear and deterioration of roads and structures due to the additional traffic.	Within the Environmental Statement, committed developments combined with the Project flows contribute to the cumulative assessment for daily traffic increases against future baseline. Where required, mitigation measures have been provided and considered when assessing the cumulative impacts arising from both the Project and all other committed developments including Nationally Significant Infrastructure Projects to avoid severe residual cumulative impacts. i. The A140 forms part of the Major Road Network that provides access to the Primary Access Roads for the Project. 1 resulting in an increase of 35% of HGVs and a maximum increase of less than 10% which is deemed not significant, and no significant delays are expected. Peak hour modelling was undertaken at Site 35 A140 Stoke Ash junction at the request of Suffolk County Council. No significant capacity issues were identified although an increase in delay on the minor roads in the AM peak was identified. ii. The Applicant has assessed driver delay and public transport delay to passengers in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. For Link PAR 10 A143 although there would be an increase of 23% of HGVs, no significant effects were identified based on the sensitivity of the road link. For PAR 16 A1120 Church Road/A1120 Bell's Lane and for PAR 17 A1120 south of A14 J50 there would be an increase of 55% of HGVs. Mitigation has been proposed along these PARs to avoid peak hour movements by construction traffic to remove

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			interaction with sensitive receptors (e.g. pupils attending Freeman Primary School). No significant effects were identified following this mitigation and other measures outlined within the 7.3 Outline Construction Traffic Management Plan [APP-309]. For the PAR 22 A1214 London Road there would be an increase in HGVs of 48%. However, no significant effects were identified based on the sensitivity of the road link. iii. 7.3 Outline Construction Traffic Management Plan [APP-309] has been developed in consultation with the Local Highway Authorities. Cycle safety has been discussed with the Applicant, and where necessary, additional access arrangements and improved interactivity, improving safety between Primary Access Routes (PARs) and cycle paths has been incorporated into the proposals. Additional mitigation measures have been established as part of the air quality and noise assessments against Institute of Environmental Management and Assessment guidelines. As set out in Table 5.7 of 7.3 Outline Construction Traffic Management Plan [APP-309] for the A140, an issue has been detected of potential pedestrians and cyclists at the junction where there is an increase in HGV and total traffic. Although off-carriageway facilities are provided, width is reduced by adjacent vegetation. The additional mitigation proposed is maintenance of vegetation adjacent to shared footway to increase available width.

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			There is no additional mitigation proposed specifically relating to cyclist safety for the A143, A1120 or A1214; however, the driver information pack, which will be provided on site induction, includes information on cycleways and warning of routes which could have a higher volume of cyclists. Further information on the driver information pack is set out in Section 6.2 of 7.3 Outline Construction Traffic Management Plan [APP-309]. The Applicant will encourage the Main Works Contractor(s) to highlight these specific routes within the driver information pack to ensure construction drivers are aware of the concerns raised. The Applicant has assessed pedestrian, cyclist and horse-rider delay, severance, amenity and fear and intimidation in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. The assessment for pedestrian, cyclists and horse-riders found no significant effects identified for severance on the A143, A1120, or A1214. iv. The assessment of driver and public transport passenger delay shows that there are no significant effects on the A143, A1120 and A1214 as detailed within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. Therefore, the need to use minor roads is not considered likely. The Applicant will liaise with Suffolk County Council during the construction of the Project to address any concerns.

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			Sensitive junctions along the A140, A143, A1120 and A1214 were subject to AM and PM peak hour modelling as presented within 7.11 Transport Assessment [APP-333]. These assessments considered the cumulative effects on the highway network of the combined Project and other committed developments and mitigation provided where required as outlined within the 7.3 Outline Construction Traffic Management Plan [APP-309]. PAR 10 A143 Old Bury Road: At Site 16 A140 Ipswich Rd / A143 Old Bury Rd, the junction modelling found no capacity issues for the PM peak. In the AM peak the introduction of the Project traffic has a minor impact upon junction capacity. The Ratio of Flow to Capacity (RFC) value on the A143 (E) arm increases from 0.93 to 0.99 when compared to the future base with committed development. The delay at this arm rises from 33 seconds to 70 seconds. At Site 17 A143 Old Bury Rd / B1077 Stuston Rd roundabout, the junction modelling found that the addition of the Project traffic has a negligible impact upon junction capacity. The highest RFC occurs in the AM Future Base plus Committed Development and Project flows on the B1077 Stuston Road north arm, with a delay of 5 seconds and an RFC of 0.42. At Site 18 A143 Old Bury Rd / Lion Rd Priority Junction, the junction modelling found that the addition of the Project traffic has a negligible impact upon junction capacity. The highest RFC occurs in

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			the AM Future Base plus Committed Development and Project flows on the Lion Road (N) Right Turn, with a delay of 15 seconds and an RFC of 0.44. PAR 16 A1120 Church Road/A1120 Bell's Lane: At Site 21 A14 J50 Cedars Interchange, the modelling found that the addition of the Project traffic has a negligible impact upon junction capacity. The highest RFC occurs in the PM Future Base plus Committed Development and Project flows on the A14 WB offslip, with a delay of 5 seconds and an RFC of 0.57. At Site 22 A1120 (Church Rd / B1115 Stowmarket Rd Priority Junction), an off peak hour modelling assessment was undertaken to avoid the AM and PM peak hours as a result of mitigation proposed along PAR 16 to avoid school drop-off and pick-up periods. It was found that the addition of the Project would not have a significant impact on capacity. The highest RFC occurs in the AM Future Base plus Committed Development and Project flows on the B1115 (W) Right Turn with an RFC of 0.68, with a delay of 37.67 seconds, an increase of 6.52 from Future baseline. At Site 23 A1120 Church Rd / Thorney Green Priority Junction, the modelling found that the addition of the Project traffic does not have a materially detrimental impact upon junction operation. The only notable delay occurs during the AM peak at the Thorney Green (NW) right and ahead movement, increasing from 26 seconds in the Base to 38 seconds with Project flows. This

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			movement operates within capacity with the Project flows (RFC of 0.46). PAR 17 A1120 (south of A14 J50): At Site 24 A1120 / Gun Cotton Way roundabout, the modelling found that the addition of the Project traffic has a negligible impact upon junction capacity. The highest RFC occurs in the PM on Gun Cotton Way, with an RFC of 0.51 and a delay of 5 seconds. At Site 25 A1120 / B1113 Needham Rd the modelling found the junction operates within capacity across all scenarios and time periods, with no significant delays. The highest degree of saturation (DoS) occurs in the AM Future Base plus Committed Development and Project flows on the B1113 Needham Road U-turn left, with a DoS of 80.7% and a delay of 35 seconds, an increase of only 2.3 seconds when compared with the future baseline with committed developments. Mitigation at the junction is in the form of signal optimisation. PAR 22 A1214 London Road: At Site 29 A14 J55 Copdock Interchange the modelling found that the junction would operate over capacity during the worst case peak construction period (one-week duration) and when tested with the 85 percentile of Project traffic (approximately a six month duration). Mitigation at the junction is currently being progressed and includes signal and cycle time optimisation, a change to lane and destination arrow markings on

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			the A1214 and A12 approaches to the roundabout, and on the circulatory carriageway. With mitigation the junction is predicted to perform better, most notably under the 85th percentile scenario. The Applicant will continue to engage with Suffolk County Council on the proposed mitigation and modelling assessments. At Site 30 A1214 London Rd / Scrivener Dr roundabout, under the existing highway arrangement, the modelling found that the roundabout operates within capacity across all scenarios and time periods, with no significant delays. The highest DoS occurs in the PM Future Base plus Committed Development and Project flows on the Ahead/Left Lane of Retail Park EB, with a delay of 21.3 seconds and a DoS of 88.4%. Mitigation at the junction is in the form of signal optimisation. At Site 31 A1214 London Rd / A1071 the modelling found that the partially signalised junction operates within capacity across all scenarios and time periods in the AM peak, but mostly just above capacity in the PM peak, with delays reaching a high of up to 95.5 seconds after incorporating mitigation. The highest DoS occurs in the PM Future Base plus Committed Development and Project flows on the Ahead/Left/Right Lane of Scrivener Drive NB, with a delay of 120 seconds and a DoS of 97.2%. Mitigation at the junction is in the form of rationalising Intergreens, adding phase delays and optimising signals. It is understood that this junction will be upgraded as part of the

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			approved planning application Land north of the A1071 (DC/21/02671), although a construction date has not been agreed. As such the Applicant is currently in the process of modelling the upgraded junction to assess the impact of the Project on capacity, and will continue to engage with Suffolk County Council of the results of the latest assessment. v. The Applicant notes Suffolk County Council's comments regarding the potential for increased wear and deterioration of roads and structures arising from additional traffic, and welcomes further engagement with Suffolk County Council on this matter. The Applicant also draws attention to paragraph 13 of Part 4 of Schedule 16 to 3.1 Draft Development Consent Order [APP-056], which specifies that the repair of any damage that is directly attributable to the Applicant's use of the highways by extraordinary traffic will constitute an extraordinary expense. Whilst the Applicant has the discretion to reimburse the relevant highway authorities for all or part of the amount of any extraordinary expense, the relevant highway authority may have recourse to Section 59 of the Highways Act 1980 in the usual way.
12.174	Suffolk County Council	<i>Successive inter-project cumulative effects</i> It is likely least some of the proximal NSIPs will be delivered at the same time with overlapping cumulative transport impacts there will also be a	An assessment of cumulative effects undertaken in accordance with 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297] is presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] which also

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		cumulative impact through repeated successive projects impacting on specific geographical area.	assesses inter-project cumulative effects from clusters of other development including NSIPs.
12.178	Suffolk County Council	<i>Operational Phase Impacts</i> AIL movements causing disruption if no resilient route has been provided.	The Applicant does not anticipate that the development would require significant quantities of decommissioning Abnormal Indivisible Load (AIL) movements, and as such any requirements could be addressed on a case-by-case basis. These do not form part of the assessment per 6.20 Scoping Opinion [APP-297]. Where special-order movements are required for decommissioning, the standard procedure will be followed. This will include engagement with the Local Highway Authorities, and use of the Electronic Service Delivery for Abnormal Loads (ESDAL) system. Requirement 13 in Schedule 3 to the 3.1 Draft Development Consent Order [APP-056] sets out that: <i>‘In the event that, at some future date, the authorised development, or part of it, is to be decommissioned, a written scheme of decommissioning must be submitted to the relevant planning authority for its approval in consultation with the relevant highway authority, at least six months prior to decommissioning works.’</i>
12.181	Suffolk County Council	<i>Decommissioning Phase Impacts</i> There are potential impacts from decommissioning traffic, port traffic, abnormal indivisible loads, and upon PRow.	Decommissioning effects were scoped out of the Environmental Statement (Volume 6 of the DCO Application), as per 6.20 Scoping Opinion [APP-297]. There are currently no specific plans to decommission the Project, as detailed in Section 4.11 in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. Table 4.12 in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] summarises the assessment

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			of likely significant effects from decommissioning. It states that the decommissioning works would generate traffic associated with the construction vehicles required to transport materials off site, and associated staff vehicles. The decommissioning works would likely involve a much smaller workforce and quantity of traffic than during construction. This also assumes that standard mitigation measures, such as those set out in the 7.2 Outline Code of Construction Practice [Revision B] would be implemented during decommissioning activities. Therefore, there are unlikely to be any significant effects on traffic and transport, including Public Rights of Way, during decommissioning. Requirement 13 in Schedule 3 to the 3.1 Draft Development Consent Order [APP-056] sets out that: <i>‘In the event that, at some future date, the authorised development, or part of it, is to be decommissioned, a written scheme of decommissioning must be submitted to the relevant planning authority for its approval in consultation with the relevant highway authority, at least six months prior to decommissioning works.’</i> The Applicant does not anticipate that the development would require significant quantities of decommissioning Abnormal Indivisible Load movements, and as such any requirements could be addressed on a case-by-case basis. Where special-order movements are required for decommissioning, the standard procedure will be followed. This will include engagement with the Local Highway Authorities, and use of the Electronic Service Delivery for Abnormal Loads (ESDAL) system.

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12.185	Suffolk County Council	<i>Construction Traffic Management and Travel Plan [APP-309] - HGV Movements</i> The Applicant proposes HGV deliveries on six days a week, excluding Sundays and bank holidays (para. 2.3.2). It is recommended that the wording be altered to HGV movements to clearly include trips that are not deliveries such as removal of spoil from site. Also, if working hours are restricted on Saturday afternoons (as above) so too should be HGV deliveries.	The 7.3 Outline Construction Traffic Management Plan (CTMP) [APP-309] states that construction traffic operating outside of the agreed hours is a matter of non-compliance. Therefore, all HGV movements on the primary access routes are controlled by the CTMP irrespective of whether they are delivering material to or from site. The Applicant notes this comment. HGV movements associated with the Project are constrained to the working hours (detailed in 3.1 Draft Development Consent Order [APP-056] Requirements), unless otherwise agreed with the Local Highway Authority. There are a number of operations which may take place outside of core working hours (paragraph 2.3.3 of 7.3 Outline Construction Traffic Management Plan [APP-309]) which are not expected to have a large number of HGV trips associated.
12.186	Suffolk County Council	<i>HGV movements</i> The OCTMP para. 5.4.14 [APP-309] states that “The number of HGV movements has been calculated and assessed using a comprehensive trip generation and distribution approach which is summarised within Section 6.2 of the Transport Assessment (document reference 7.11)”, however this section of the TA is blank.	The Applicant notes this comment, this will be rectified through the Errata process.
12.187	Suffolk County Council	<i>Construction Traffic Management and Travel Plan [APP-309] – Network Peak and Construction Workers Peak</i> Paragraph 5.4.13 states that construction worker LGVs are to arrive outside the existing network peaks of 0800-0900 and 1700 – 1800, however SCC is	7.3 Outline Construction Traffic Management Plan (CTMP) [APP-309] details that the Travel Plan Coordinator will be responsible for the monitoring and management of measures within the CTMP, including the collection of data from staff regarding actual shift start and end times, car occupancy rates and mode

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		concerned that as this is also what other NSIPs propose, new network peaks could be created outside of the existing peaks.	share. This will form part of the quarterly monitoring report issued to the Local Highway Authority. There are a number of junctions proposed to be monitored by the Main Works Contractor(s), where new network peaks would be identified. The Applicant has and will continue to engage with Suffolk County Council on this matter.
12.188	Suffolk County Council	<i>Construction Traffic Management and Travel Plan [APP-309] – Definitions</i> It is noted in the Glossary of the OCTMP [APP-309] that the definition of HGV in terms of weight is that which “exceeds limits set out in terms of weight (>44 tonnes)”. SCC would consider an GV to be any commercial vehicle exceeding 3.5 tonnes, which would be commensurate with other NSIPs.	This is noted by the Applicant. An updated version of the Outline Construction Traffic Management Plan will be made available following the Errata process addressing this point.
12.191	Suffolk County Council	<i>Construction Traffic Management and Travel Plan [APP-309] – Controls</i> SCC would consider the appropriate controls reasonable HGV routes i. HGV timing ii. Daily HGV cap iii. Peak hour cap iv. With the following measured and reported v. Worker numbers vi. Worker car occupancy (or worker trips)	7.3 Outline Construction Traffic Management Plan [APP-309] provides details of the construction routeing strategy and working hours. HGV drivers not adhering to the agreed routes and operating outside the agreed hours are matters of non-compliance, that would follow the procedure detailed in Section 6.3 of 7.3 Outline Construction Traffic Management Plan [APP-309] . The Applicant has undertaken a robust trip generation and assessment exercise for both the Overhead Lines and Cables and Substation construction activities. This has been calculated as a worst-case assessment, to be transparent in the expected trips along each construction route. The Applicant has stated within 7.3 Outline Construction Traffic Management Plan [APP-309] , paragraph 5.4.17 ‘Given ... the comprehensive trip generation and distribution

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			<i>approach and the proposed mitigation measures, a cap on vehicle numbers is not considered necessary</i>’. The Applicant has also committed to monitoring and managing the Project’s impact on the road network, with 7.3 Outline Construction Traffic Management Plan [APP-309] stating that the Main Works Contractor(s) will be expected to monitor the number of construction vehicles using the Primary Access Routes between the sites and the Strategic Road/Major Road network. 7.3 Outline Construction Traffic Management Plan - Appendix B Outline Construction Worker Travel Plan [APP-311] includes information on how the Main Works Contractor(s) and the Travel Plan Coordinator (TPC) will capture the level of staff arriving by car and non-car modes, and changes in staff arrival and departure times. It is anticipated that these measures combined will report the worker numbers and the worker car occupancy. The mode capturing is anticipated to include Car Driver and Car Passenger, so a car occupancy factor can be derived. The information will be shared with Suffolk County Council on a quarterly basis.
12.192	Suffolk County Council	<i>Required Mitigation</i> In summary, the proposed application will in the construction phase: i. result in a significant increase in HGV movements on the A140 and A143, particularly when considered in combination with other concurrent NSIPs.	Within the Environmental Statement, committed developments combined with the Project flows contribute to the cumulative assessment for daily traffic increases against future baseline. Where required, mitigation measures have been provided and considered when assessing the cumulative impacts arising from both the Project and all other committed developments including Nationally

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		ii. increase HGV movements resulting in increased delay and reduced residual capacity on the A140, A143, A1120, A1214, iii. add to delays where predicted future growth scenarios indicate congestion will be significant, particularly in peak periods, most noticeably to the east of Ipswich. iv. increase HGV movements along the A140, A143, A1120, A1214, reducing the attractiveness of the routes for users of sustainable transport, particularly cycling, as well as increasing severance in communities along the route.	Significant Infrastructure Projects to avoid severe residual cumulative impacts. v. The Applicant has assessed driver delay and public transport delay to passengers in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. For Link PAR 10 A143, although there would be an increase of 23% of HGVs, no significant effects were identified based on the sensitivity of the road link. For PAR 16 A1120 Church Road/A1120 Bell's Lane and for PAR 17 A1120 south of A14 J50, there would be an increase of 55% of HGVs. Mitigation has been proposed along these PARs to avoid peak hour movements by construction traffic to remove interaction with sensitive receptors (e.g. pupils attending Freeman Primary School). No significant effects were identified following this mitigation and other measures outline within the 7.3 Outline Construction Traffic Management Plan [APP-309]. For the PAR 22 A1214 London Road there would be an increase in HGVs of 48%. However no significant effects were identified based on the sensitivity of the road link. The A140 forms part of the Major Road Network that provides access to the Primary Access Roads for the Project. It was therefore not included within the assessment undertaken within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271], as per 6.20 Scoping Opinion [APP-297]. 7.11 Transport Assessment [APP-333] has assessed the forecast percentage

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			increases of traffic flows on the A140, resulting in an increase of 35% of HGVs and a maximum increase of less than 10% which is deemed not significant, and no significant delays are expected. Peak hour modelling was undertaken at Site 35 A140 Stoke Ash junction at the request of Suffolk County Council. No significant capacity issues were identified although an increase in delay on the minor roads in the AM peak was identified. vi. Sensitive junctions along the A140, A143, A1120 and A1214 were subject to AM and PM peak hour modelling as presented within 7.11 Transport Assessment [APP-333]. These assessments considered the cumulative effects on the highway network of the combined Project and other committed developments and mitigation provided where required as outlined within the 7.3 Outline Construction Traffic Management Plan [APP-309]. PAR 10 A143 Old Bury Road: At Site 16 A140 Ipswich Rd / A143 Old Bury Rd, the junction modelling found no capacity issues for the PM peak. In the AM peak the introduction of the Project traffic has a minor impact upon junction capacity. The Ratio of Flow to Capacity (RFC) value on the A143 (E) arm increases from 0.93 to 0.99 when compared to the future base with committed development. The delay at this arm rises from 33 seconds to 70 seconds. At Site 17 A143 Old Bury Rd / B1077 Stuston Rd roundabout, the junction modelling found that the

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			addition of the Project traffic has a negligible impact upon junction capacity. The highest RFC occurs in the AM Future Base plus Committed Development and Project flows on the B1077 Stuston Road north arm, with a delay of 5 seconds and an RFC of 0.42. At Site 18 A143 Old Bury Rd / Lion Rd Priority Junction, the junction modelling found that the addition of the Project traffic has a negligible impact upon junction capacity. The highest RFC occurs in the AM Future Base plus Committed Development and Project flows on the Lion Road (N) Right Turn, with a delay of 15 seconds and an RFC of 0.44. PAR 16 A1120 Church Road/A1120 Bell's Lane: At Site 21 A14 J50 Cedars Interchange, the modelling found that the addition of the Project traffic has a negligible impact upon junction capacity. The highest RFC occurs in the PM Future Base plus Committed Development and Project flows on the A14 WB offslip, with a delay of 5 seconds and an RFC of 0.57. At Site 22 A1120 (Church Rd / B1115 Stowmarket Rd Priority Junction), an off peak hour modelling assessment was undertaken to avoid the AM and PM peak hours as a result of mitigation proposed along PAR 16 to avoid school drop-off and pick-up periods. It was found that the addition of the Project would not have a significant impact on capacity. The highest RFC occurs in the AM Future Base plus Committed Development and Project flows on the B1115 (W) Right Turn with an RFC of 0.68, with

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			a delay of 37.67 seconds, an increase of 6.52 from Future baseline. At Site 23 A1120 Church Rd / Thorney Green Priority Junction, the modelling found that the addition of the Project traffic does not have a materially detrimental impact upon junction operation. The only notable delay occurs during the AM peak at the Thorney Green (NW) right and ahead movement, increasing from 26 seconds in the Base to 38 seconds with Project flows. This movement operates within capacity with the Project flows (RFC of 0.46). PAR 17 A1120 (south of A14 J50): At Site 24 A1120 / Gun Cotton Way roundabout, the modelling found that the addition of the Project traffic has a negligible impact upon junction capacity. The highest RFC occurs in the PM on Gun Cotton Way, with an RFC of 0.51 and a delay of 5 seconds. At Site 25 A1120 / B1113 Needham Rd the modelling found the junction operates within capacity across all scenarios and time periods, with no significant delays. The highest degree of saturation (DoS) occurs in the AM Future Base plus Committed Development and Project flows on the B1113 Needham Road U-turn left, with a DoS of 80.7% and a delay of 35 seconds, an increase of only 2.3 seconds when compared with the future baseline with committed developments. Mitigation at the junction is in the form of signal optimisation.

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			PAR 22 A1214 London Road: At Site 29 A14 J55 Copdock Interchange the modelling found that the junction would operate over capacity during the worst case peak construction period (one-week duration) and when tested with the 85 percentile of Project traffic (approximately a six month duration). Mitigation at the junction is currently being progressed and includes signal and cycle time optimisation, a change to lane and destination arrow markings on the A1214 and A12 approaches to the roundabout, and on the circulatory carriageway. With mitigation the junction is predicted to perform better, most notably under the 85th percentile scenario. The Applicant will continue to engage with Suffolk County Council on the proposed mitigation and modelling assessments. At Site 30 A1214 London Rd / Scrivener Dr roundabout, under the existing highway arrangement, the modelling found that the roundabout operates within capacity across all scenarios and time periods, with no significant delays. The highest DoS occurs in the PM Future Base plus Committed Development and Project flows on the Ahead/Left Lane of Retail Park EB, with a delay of 21.3 seconds and a DoS of 88.4%. Mitigation at the junction is in the form of signal optimisation. At Site 31 A1214 London Rd / A1071 the modelling found that the partially signalised junction operates within capacity across all scenarios and time periods in the AM peak, but mostly just above

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			capacity in the PM peak, with delays reaching a high of up to 95.5 seconds after incorporating mitigation. The highest DoS occurs in the PM Future Base plus Committed Development and Project flows on the Ahead/Left/Right Lane of Scrivener Drive NB, with a delay of 120 seconds and a DoS of 97.2%. Mitigation at the junction is in the form of rationalising Intergreens, adding phase delays and optimising signals. It is understood that this junction will be upgraded as part of the approved planning application Land north of the A1071 (DC/21/02671), although a construction date has not been agreed. As such the Applicant is currently in the process of modelling the upgraded junction to assess the impact of the Project on capacity, and will continue to engage with Suffolk County Council of the results of the latest assessment. vii. 7.3 Outline Construction Traffic Management Plan [APP-309] has been developed in consultation with the Local Highway Authorities. Cycle safety has been discussed with the Applicant, and where necessary, additional access arrangements and improved interactivity, improving safety between Primary Access Routes (PARs) and cycle paths has been incorporated into the proposals. Additional mitigation measures have been established as part of the air quality and noise assessments against Institute of Environmental Management and Assessment guidelines. As set out in Table 5.7 of 7.3 Outline Construction Traffic Management Plan [APP-309] for the A140, an issue has been detected of potential pedestrians

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			and cyclists at the junction where there is an increase in HGV and total traffic. Although off-carriageway facilities are provided, width is reduced by adjacent vegetation. The additional mitigation proposed is maintenance of vegetation adjacent to shared footway to increase available width. There is no additional mitigation proposed specifically relating to cyclist safety for the A143, A1120 or A1214, however the driver information pack, which will be provided on site induction, includes information on cycleways and warning of routes which could have a higher volume of cyclists. Further information on the driver information pack is set out in Section 6.2 of 7.3 Outline Construction Traffic Management Plan [APP-309]. The Applicant will encourage the Main Works Contractor(s) to highlight these specific routes within the driver information pack to ensure construction drivers are aware of the concerns raised. The Applicant has assessed pedestrian, cyclist and horse-rider delay, severance, amenity and fear and intimidation in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. The assessment for pedestrian, cyclists and horse-riders found no significant effects identified for severance on the A143, A1120, A1214.
18.4	Suffolk County Council	<i>Summary (Public Rights of Way)</i> The following safety measures will also be employed for each PROW crossing:	i. The 7.6 Outline Public Rights of Way Management Plan [APP-329] states that temporary Public Right of Way (PROW) provisions are expected to be largely unsurfaced, in line with

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		i. Where a PROW crosses the haul road, the surface will be firm, smooth, level and free draining with no loose stones or voids on the surface. This may require additional work to the type 1 surface such as compacting fines (4 or 6mm to dust aggregate) to fill voids. ii. No steps or gradients will be introduced which could deter wheeled users (1in 20 is the accepted standard). The crossing will be maintained in a safe and fit condition for use by pedestrians, wheeled users, cyclists and equestrians (as appropriate) all year round, to the reasonable satisfaction of the Highway Authority; iii. Use of signage (including Give Way signs) to ensure that haul road users are aware of the potential for PROW users to cross their path and PROW users are aware that they are approaching a construction interface with the associated hazards; iv. Use of vehicle marshals during construction hours to ensure the general public using the PROW are able to safely cross the construction area; v. A speed restriction to 10mph along the haul road/construction roads in the vicinity (circa 20m) of the PROW (speed limit on the remainder of the haul road will be 30mph); vi. Information regarding the presence of the PROW and the potential for PROW users will be included in the Method Statements, such that vehicle and plant operators will be mindful always for members	existing PROWs. However, where necessary due to the type of usage (for example at haul roads) the relevant section of the PROW would be reinforced with a suitable granular material such as '6 mm to fines' Granite-type material and that any such measures would be subject to discussion with the relevant Local Highway Authority (LHA) PROW Officers. ii. The 7.6 Outline Public Rights of Way Management Plan [APP-329] confirms that temporary PROW provisions are expected to be in line with the existing provision of the PROW and that regular site inspections will be carried out across the Project to monitor compliance against the Plan, good practice measures and other commitments made by the Project. The 7.3 Outline Construction Traffic Management Plan [APP-309] also states that daily checks will be carried out on the condition of PROW within the Order Limits. iii. The 7.6 Outline Public Rights of Way Management Plan [APP-329] and the 7.3 Outline Construction Traffic Management Plan [APP-309] state that appropriate signage will be provided along haul roads and PROWs to warn of potential vehicle / PROW user conflict points. iv. The 7.6 Outline Public Rights of Way Management Plan [APP-329] states that, where a PROW crosses a temporary access track or haul road, a system of signs informing PROW users and drivers of construction vehicles would be put in place to warn of potential vehicle / PROW user conflict points and would be supported by low

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		of the public (hikers, dog walkers, horse riders, cyclists etc); vii. No-reversing restrictions will be in place at locations where construction traffic interact with PROW; viii. Stopping/parking of vehicles and mobile plant will not be permitted at locations where construction traffic interacts with PROW; ix. Temporary fencing to be installed along the length of the working width, with gaps in the fencing to allow access along the PROWs. Signage will be in place so that users can quickly identify the continuation of the route across the haul road; x. Information regarding these measures will be a compulsory part of the induction training for drivers; xi. The surface of each PROW where it crosses the construction road will be kept in a safe and fit condition at all times for all legal users. The PROW will be maintained to a standard agreed with SCC as Local Highway Authority; and xii. The positioning of site notices will be carefully considered to keep sign clutter to a minimum and to collate information on route closures where appropriate. Signs will be carefully worded with clear, uncomplicated information showing maps that the public would be familiar with (e.g. OS maps with topography context) to give them confidence that their walk or ride will still be possible, albeit with a minor diversion.	vehicle speeds and driver protocols. Such crossing points would be comparable to an uncontrolled crossing of a typical road. However, for periods of the construction phase it may be necessary to adopt management measures involving contractor's staff at potential conflict points. The need for such management would be subject to specific risk assessments prepared by the Main Works Contractor, which will be discussed with the relevant LHA PROW Officers. v. The 7.6 Outline Public Rights of Way Management Plan [APP-329] states that speed limit signage would be provided at PROW crossings to ensure that all construction vehicles travel at low speeds (nominally 5 mph on off-road sections of route) to ensure safety. vi. The 7.6 Outline Public Rights of Way Management Plan [APP-329] and the 7.3 Outline Construction Traffic Management Plan [APP-309] state that instructions and information regarding construction vehicle / PROW user interactions and locations would be provided to drivers, through site inductions, driver briefings, information packs and other toolbox talks, and that driver protocols would be put in place, signed up to by drivers. vii. Noted. Any such restriction will be dependent upon the work being undertaken and the specifics of the location but can be considered during the production of the final PROW Management Plan and other documentation as they are developed by the Main Works Contractor.

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			viii. Noted. Any such restriction will be dependent upon the work being undertaken and the specifics of the location but can be considered during the production of the final PRow Management Plan and other documentation as they are developed by the Main Works Contractor. ix. The 7.2 Outline Code of Construction Practice [Revision B] commitment GG29 notes that working areas will be appropriately fenced and that access control measures to working areas will typically be in place for safety and security. The 7.6 Outline Public Rights of Way Management Plan [APP-329] states that haul road crossings will be managed using appropriate access controls, which may include gates access of the PRow or the haul road, or other appropriate measures, and that signage will be provided. The selection of measures will depend upon the level of interaction and user type, minimising disruption to users whilst also ensuring safety, and will be discussed with LHA PRow Officers. x. Noted – see response to (vi) above. xi. Noted – see response to (i) and (ii) above. xii. The 7.6 Outline Public Rights of Way Management Plan [APP-329] provides information in relation to proposed signage and positioning, including in relation to advanced warning signs of temporary closures, diversion signage and waymarking, typical signage wording / mapping detail and that arrangements will be discussed with the relevant LH PRow Officers prior to installation and prior to any diversions etc. being implemented. The 7.6 Outline Public Rights of Way

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			Management Plan [APP-329] also states that signage provided will be regularly inspected by the Main Works Contractor to ensure it remains in place and has not been tampered with and that all signage would contain contact details for National Grid and the Main Works Contractor to enable PRoW users to report any problems encountered.
18.7	Suffolk County Council	PROW Reinstatement A qualified Agricultural Liaison Officer (“ALO”) will be employed to ensure that information on existing land conditions is obtained, recorded and verified during the PROW surveys.	In accordance with mitigation measures GG06 and GG15 of the 7.2 Outline Code of Construction Practice [Revision B], pre- and post-construction condition surveys will be undertaken of any Public Rights of Way affected by the works, in conjunction with a suitable representative from the relevant Local Highway Authority. The Applicant will give due consideration to the request to employ a qualified Agricultural Liaison Officer.
18.9	Suffolk County Council	PROW Reinstatement 18.9 The pre-condition and post-construction surveys will include a photographic record with accompanying map and table listing:- Date record taken; i. Map reference; ii. Reference and type of PROW; iii. Overview description of PROW, giving average width, surface type, general condition; iv. Highlighting any defects in current condition such as wet areas, pre-existing surface damage such as ruts, compaction, or obstructions; and	The 7.6 Outline Public Rights of Way Management Plan [APP-329] confirms that pre-commencement condition surveys of affected Public Rights of Way (PRoWs) will be undertaken prior to the commencement of construction. A full record of condition will be carried out (photographic and descriptive) of PRoWs within the Order Limits. This will include taking detailed records including photographs showing the condition of the PRoWs including existing surfacing and any crossing points such as bridges and stiles.

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		v. Note any other vehicle use (farm or private vehicle use).	
Table 15 – 15b	Suffolk County Council	<i>Table 15: Summary of Impacts – Public Rights of Way</i> Description of Impact: Impacts of construction on Public Rights of Way including diversions, closures, and amenity. Required Mitigation: Plan. A robust PRow strategy will be required. Further assessment work required on the impacts of traffic and transport including for cumulative effects and improved methodology	The Applicant confirms that 7.6 Outline Public Rights of Way Management Plan [APP-329] has been prepared and submitted as part of the Development Consent Order application. This sets out the strategy for managing Public Rights of Way (PRow) during construction, including arrangements for temporary closures and diversions. In accordance with Requirement 4 of the 3.1 Draft Development Consent Order [APP-056], a final PRow Management Plan will be developed by the appointed Main Works Contractor prior to the commencement of each stage of the authorised development, in consultation with the Local Highway Authority. The assessment for the pedestrian, cyclist and horse-rider delay on PRow is presented in Table A16.4.3 of the 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] includes an inter-project assessment of potential in-combination effects arising from the Project and other developments planned in the area. Paragraph 17.5.66 concludes that there is likely to be an inter-project cumulative effect on PRow, footpaths and bridleways; however, it is noted that other developments would apply PRow management measures to minimise disruption, including diversions and as such it is anticipated that

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			the cumulative effects would be negligible and not significant on recreational routes.
Table 15 – 15c	Suffolk County Council	<i>Table 15: Summary of Impacts – Public Rights of Way</i> Description of Impact: Long-term impacts on Public Rights of Way including diversions, closures, and amenity Required Mitigation: Robust controls within the PRow Management Plan. PRow enhancement where required	The Applicant confirms that 7.6 Outline Public Rights of Way Management Plan [APP-329] has been prepared and submitted as part of the Development Consent Order application. This sets out the strategy for managing Public Rights of Way (PRow) during construction, including arrangements for temporary closures and diversions. In accordance with Requirement 4 of the 3.1 Draft Development Consent Order [APP-056], a final PRow Management Plan will be prepared by the Main Works Contractor in consultation with the Local Highway Authority, securing robust controls for PRow management throughout construction. Whilst the intention is to reinstate any affected PRow to its original line and condition once construction is complete, and to remove any temporary mitigation, there may be opportunities for certain temporary measures to be retained as permanent improvements, subject to the agreement of the relevant Local Highway Authority and landowners.
Table 15 – 15d	Suffolk County Council	<i>Table 15: Summary of Impacts – Public Rights of Way</i> Description of Impact: Impact of surface infrastructure (including construction traffic) Required Mitigation: A PRow strategy will be required.	See response to Table 15 – 15b.
Table 15 – 15e	Suffolk County Council	<i>Table 15: Summary of Impacts – Public Rights of Way</i>	See response to Table 15 – 15b.

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		Description of Impact: Impact of underground cables (including decommissioning traffic) Required Mitigation: A PROW strategy will be required.	
Table 15 – 15f	Suffolk County Council	<i>Table 15: Summary of Impacts – Public Rights of Way</i> Description of Impact: Closure of PROW for lengthy periods of time can result in significant changes to people’s behaviours, leading to adverse effects on mental and physical health and wellbeing. Required Mitigation: PROW closures must be minimised. The Access & PROW plans need to include proposed diversions for temporarily stopped up PROW. Agreed with the Local Highway Authority. Must be documented in the Construction Management Plan	The overall strategy, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], is to maintain access along Public Rights of Way (PROWs) at all times throughout the construction period, either through managed access along the PROW on its existing alignment or through provision of appropriate diversions. As such there are no PROWs within Suffolk that would be subject to closure without diversion, no severance of the overall network as a result of the Project, and disruption to PROW users would be limited. The proposed sections of PROW to be temporarily closed during construction, together with the alignments of their associated diversions, are shown on the 2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-033 to APP-040 inclusive]. As detailed design progresses, the precise alignment will be developed in consultation with the Local Highway Authority PROW Officer and secured through the approval process.
Table 15 – 15g	Suffolk County Council	<i>Table 15: Summary of Impacts – Public Rights of Way</i> Description of Impact: Damage by vehicles using or crossing PROW, including to the substructure, resulting in difficulty in reinstatement to the same standard that was	The 7.6 Outline Public Rights of Way Management Plan [APP-329] identifies interactions between Public Rights of Way (PROW) and haulage routes and provides a commitment to pre- and post-construction condition surveys for all affected PROWs, undertaken with relevant representatives from the Local Highway

ID	Stakeholder	Comment	NG response
		previously present and ongoing maintenance liabilities. Required Mitigation: Applicant to confirm internal haulage routes and identify PROW impacted. Mitigation measures to be agreed with the Local Highway Authority, including commuted sums e.g., or compaction that might result in flooding, reinstatement of boundary features. Must be documented in the Construction Management Plan	Authority, to ensure that any impacts arising from construction activities, including where haul roads cross PRowWs, are identified and reinstated to the Authority's reasonable satisfaction. The 7.6 Outline Public Rights of Way Management Plan [APP-329] also confirms that PRow surfaces will be maintained in a safe and fit condition throughout construction, with appropriate management measures applied where construction traffic interacts with PRowWs. A final PRow Management Plan will be prepared by the Main Works Contractor, in consultation with the Local Highway Authority, to agree the detailed arrangements for managing, maintaining and reinstating affected PRowWs.
Table 15 – 15j	Suffolk County Council	<i>Table 15: Summary of Impacts – Public Rights of Way</i> Description of Impact: Detrimental impact to PRow • PRow are both historic and living features that are part of the landscape, and need to be assessed as such in order to identify appropriate treatment Required Mitigation: Robust controls within the PRow Management Plan. PRow enhancement where required	See response to Table 15 – 15c.
Table 15 – 15l	Suffolk County Council	<i>Table 15: Summary of Impacts – Public Rights of Way</i> Description of Impact: Impact of underground cables (including construction traffic) Required Mitigation: A PRow strategy will be required.	See response to Table 15 – 15b.

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Table 15 – 15m	Suffolk County Council	<i>Table 15: Summary of Impacts – Public Rights of Way</i> Description of Impact: Long-term impacts on Public Rights of Way including diversions, closures and amenity Required Mitigation: Robust controls within the PRow Management Plan. A PROW strategy will be required.	See response to Table 15 – 15c.
Table 15 – 15n	Suffolk County Council	<i>Table 15: Summary of Impacts – Public Rights of Way</i> Description of Impact: Impact of surface infrastructure (including decommissioning traffic) Required Mitigation: A PROW strategy will be required	See response to Table 15 – 15b.
Table 15 – 15o	Suffolk County Council	<i>Table 15: Summary of Impacts – Public Rights of Way</i> Description of Impact: Impact of underground cables (including decommissioning traffic) Required Mitigation: A PROW strategy will be required	See response to Table 15 – 15b.
Table 15 – 15p	Suffolk County Council	<i>Table 15: Summary of Impacts – Public Rights of Way</i> Description of Impact: Closure of PROW for lengthy periods of time can result in significant changes to people’s behaviours, leading to adverse effects on mental and physical health and wellbeing. Required Mitigation: PROW closures must be minimised. The A&ROW plans need to include proposed diversions for	See response to Table 15 – 15f.

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		temporarily topped up PROW. Agreed with the Local Highway Authority. Must be documented in the Construction Management Plan	
Table 15 – 15q	Suffolk County Council	<i>Table 15: Summary of Impacts – Public Rights of Way</i> Description of Impact: Damage by vehicles using or crossing PROW, including to the substructure, resulting in difficulty in reinstatement to the same standard that was previously present and ongoing maintenance liabilities. Required Mitigation: Applicant to confirm internal haulage routes and identify PROW impacted. Mitigation measures to be agreed with the Local Highway Authority, including commuted sums e.g., or compaction that might result in flooding, reinstatement of boundary features. Must be documented in the Construction Management Plan	See response to Table 15 – 15g.
18.23	Suffolk County Council	<i>Operational Phase Impacts</i> Detrimental impact to historic PROW including diversions, closures and amenity.	The Applicant does not anticipate that the development would require significant operational activities that would impact on PROW and these would be addressed on a case by case basis. These do not form part of the assessment per 6.20 EIA Scoping Opinion [APP-297] .
18.29	Suffolk County Council	<i>Decommissioning Phase Impacts</i> Detrimental impact to historic PROW including diversions, closures and amenity.	Decommissioning effects were scoped out of the Environmental Statement (Volume 6 of the DCO Application), as per 6.20 Scoping Opinion [APP-297] . There are currently no specific plans to decommission the Project, as detailed in Section 4.11 in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] . Table 4.12 in 6.4

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			Environmental Statement Chapter 4 - Project Description [APP-130] summarises the assessment of likely significant effects from decommissioning. It states that the decommissioning works would generate traffic associated with the construction vehicles required to transport materials off site, and associated staff vehicles. The decommissioning works would likely involve a much smaller workforce and quantity of traffic than during construction. This also assumes that standard mitigation measures, such as those set out in the 7.2 Outline Code of Construction Practice [Revision B] would be implemented during decommissioning activities. Therefore, there are unlikely to be any significant effects on traffic and transport, including Public Rights of Way, during decommissioning.
18.32	Suffolk County Council	<i>Comments on Application Documents</i> 18.32 Where PROW cross the cable corridor, haul road, access tracks and other sites, the surface must be kept in a safe and fit condition at all times for all users. Management measures should be included within the Construction Traffic Management Plan and adequately covered and agreed in the PROWMP.	See response to 18.4 (i) and (ii) above
18.33	Suffolk County Council	<i>Comments on Application Documents</i> Pre-construction works must not obstruct or disturb any public rights of way (e.g. new fencing, archaeology surveys etc) unless otherwise agreed with SCC. Management measures should be discussed, and any temporary closures will need to be included in the DCO and adequately covered and agreed in the PROWMP.	The Applicant understands that this comment refers to 'pre-commencement' works given it appears to reference fencing works and archaeology surveys. The 7.6 Outline Public Rights of Way Management Plan [APP-329] states that all pre-commencement operations must be carried out in accordance with the 7.6 Outline Public Rights of Way Management Plan [APP-329] and that National Grid and / or its Main Works Contractor must seek the agreement of the

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			relevant Local Highway Authority before carrying out any pre-commencement operations to which measures in the Plan are relevant. Section 7 of the 7.6 Outline Public Rights of Way Management Plan [APP-329] also details how changes, including in relation to pre-construction works, would be dealt with in relation to documentation and approvals and that any changes to the Development Consent Order would be managed through the process set out in Schedule 6 of the Planning Act 2008.
18.35	Suffolk County Council	<i>Comments on Application Documents</i> Any temporary closure of a PROW must be agreed with SCC and the duration kept to the minimum necessary, this must be included within the DCO.	As set out in the 7.6 Outline Public Rights of Way Management Plan [APP-329], any temporary Public Rights of Way (PROWs) closures required during construction will be kept as short as practicable and will only be implemented where necessary. Under Requirement 4 of the 3.1 Draft Development Consent Order [APP-056], a final PROW Management Plan must be submitted to and approved by the relevant Local Highway Authority prior to commencement of the works. This ensures that the timing, duration and arrangements for any temporary closures and diversions are agreed with the relevant Local Highway Authority.
18.43	Suffolk County Council	<i>Document: 6.16 Environmental Statement Chapter 16 – Traffic and Transport</i> S02: PROWs crossing the working areas will be managed in discussion with the relevant Local Planning Authorities and SCC PROW team and potential temporary closures and diversions applied, where required. Road closures and diversions will be kept as brief as possible, with alternative routes maintained where practicable. Access disruption	As set out in the 7.6 Outline Public Rights of Way Management Plan [APP-329], Public Right of Way (PROW) crossing working areas will be managed in consultation with the relevant Local Highway Authority, including Suffolk County Council, with temporary closures or diversions applied only where necessary. Required diversions will be clearly signed, with advance information provided on alignment, duration and contact details. The detailed arrangements,

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		would be reduced while construction activities occur where practicable. Any required temporary diversions will be clearly marked at both ends with signage explaining the diversion, the duration of the diversion and a contact number for any concerns. This should be in prior discussion with SCC PROW with regards to dates, timeframes, routes and signage.	including dates, timings, routes and signage, will be agreed with the Highway Authority through the final PROW Management Plan, to be developed by the Main Works Contractor prior to construction. Where temporary road closures and diversions are required, these will be undertaken as set out in the 7.6 Outline Construction Traffic Management Plan [APP-309]. This commits to coordinating all temporary traffic management with the relevant Highway Authorities through the Permit Scheme. These established processes ensure that closures are kept to the minimum required, and that users are informed through appropriate signage and communication measures.
18.45	Suffolk County Council	<i>Required Mitigation</i> Whilst measures for PROWs include limiting closures to short durations, providing clear signage, reinstating routes in consultation with the LHA PROW Officer, and conducting precondition surveys, Public Rights of Way recommend that the local community be given advance notice of any planned PROW closures in accessible formats to ensure robust communication.	The 7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305] sets out the communications channels and approach to community engagement during the construction of the Project. This includes the appointment of a dedicated community relations team, provision of a free Project hotline, email address and Freepost address, and regular updates to Local Authorities and parish councils via the Project website and newsletters. With regard to communications on Public Right of Way (PROW) closures, diversions and associated mitigation, the 7.6 Outline Public Rights of Way Management Plan [APP-329] confirms that advance notification of the timing and duration of any closures or diversions will be provided through on-site signage, notices and clear waymarking of diversion routes, including relevant mapping and contact details.

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			These measures will ensure that local communities receive timely and accessible information about any temporary changes affecting PROW.
18.46	Suffolk County Council	<i>Required Mitigation</i> Increase wear and deterioration of PROWs and PROW structures due to the additional usage due to diversions to be assessed, monitored and mitigated recommended to LHA PROW officer.	As set out in the 7.6 Outline Public Rights of Way Management Plan [APP-329] , regular site checks will be undertaken across the Project to monitor compliance with Public Right of Way (PROW) management measures, with inspections controlled by the Environmental Manager and supported by appropriate specialists. These checks will identify any wear or deterioration arising from increased use of diversion routes, enabling any necessary mitigation to be agreed with the Local Highway Authority PROW Officer.
4.4.33	Essex County Council	<i>Cumulative impacts – Abnormal Indivisible Loads (“AIL”)</i> Another major concern around the cumulative impacts not adequately dealt with in the ES is how the number of AILs will be managed such that multiple loads are not taking place on any one day, or indeed that there is a high number of daily AILs generated by the project during an intense period. The Norwich to Tilbury scheme is proposed to generate a total of 960 AIL movements (see table below) to the compounds. There are also an additional 4 No. AILs proposed for the large mobile crane deliveries on each PAR throughout Essex, that are not included in the table below:	The indicative AIL movements set out in 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310] are to be reviewed and updated in the detailed design process undertaken by the Main Works Contractor(s). It is expected that the Main Works Contractor(s) will continue liaison with the Local Highway Authorities and key stakeholders on AIL management. 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310] details that the Electronic Service Delivery for Abnormal Loads (ESDAL) system will be used to monitor and notifications be sent to the Local Highway Authorities and police, advising them of the routes, timings and any appropriate measures required, to minimise disruption where possible. As a general rule, to minimise disruption, AIL movements will be scheduled

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			outside of peak traffic times, and in line with embargo times. The cumulative impact associated with AIL assessment would be mitigated by the use of the ESDAL system to manage any impact on the operation of the network. AILs would operate outside of peak hours and have therefore not been assessed within the 7.11 Transport Assessment [APP-333]. The assessment within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] did not include AILs as these movements did not occur within the worst-case peak construction period identified within the trip generation.
4.4.39	Essex County Council	<i>Cumulative impacts – Abnormal Indivisible Loads (“AIL”)</i> It is noted that the current process for agreeing AIL routes does allow the Local Highway Authority to place conditions on AIL applications and as such, ECC will use this to manage the impacts on the local highway network – particularly in terms of the number, timing and frequency of movements. ECC are aware that the Essex Police have limited resources to escort AILs which will likely reduce the ability for multiple AILs to be on the network on any one day and indeed Essex Police have confirmed that in any event, they generally restrict movements to one per day. ECC is also aware that there is a current embargo on AIL movements covering Ipswich Port which restricts movements during the hours of darkness. ECC would prefer AIL movements to be undertaken on the network at quietest times which is likely to be at night	The Applicant notes the concerns raised by Essex County Council. The Contractor will liaise with the Local Highway Authority and Essex Police to confirm the AIL delivery routes and escorting requirements.

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		and so the choice of port and associated route will have an impact on the operation of the network.	
4.4.40	Essex County Council	<i>Cumulative impacts – Abnormal Indivisible Loads (“AIL”)</i> Having reviewed the submitted information, it is considered further commitments are needed from the Applicant for inclusion in the outline CTMP (APP-309); AIL Access Strategy (APP-310); OCoCP (APP-301); Community Engagement and Public Information (APP-305) to provide information to residents, businesses and road users so they can plan their journeys and avoid delays as follows: - Variable Messaging Sign boards to be implemented at locations agreed with the Local Highway Authority - Communication strategy to include clear information for the general public on what AILs are, why they are needed and how they impact the local / strategic road network, with the purpose of providing a co-ordinated way for people to find out how their journey will be impacted in Essex without needing to consult multiple sources of information - Distinction in the communication strategy across the various documents between what the Contractor will implement and what National Grid will implement; and including a summary of the high-level principles for both the localised impacts and wider impacts combined with the AIL communication strategy within each document	The Applicant is committed to minimising disruption on local highway networks and acknowledges the need to provide advance warning of works in areas that may be impacted by road closures relating to construction traffic. Detailed in paragraph 5.4.23 of the 7.3 Outline Construction Traffic Management Plan [APP-309], signs are proposed on sections of the Major Road Network, Strategic Road Network and Primary Access Routes which may be subject to temporary traffic congestion and delay. The proposal to use Variable Messaging Sign (VMS) as part of this communication strategy is something the Applicant would welcome further discussion on with the relevant Local Highway Authorities. As noted in Section 6.5 of 7.3 Outline Construction Traffic Management Plan [APP-309], members of the community and local businesses will be kept informed regularly of the works through active community liaison. Section 3.3 of the 7.3 Outline Construction Traffic Management Plan [APP-309] sets out the expectation of the Main Works Contractor for community engagement and public information sharing during construction. The Main Works Contractor(s) will implement a system to provide information to local residents and occupiers about the works. A community relations team will be appointed to provide dedicated community relations and external communication support during construction. The community relations team will maintain a Project website, which will act as a central source of information for the general public.

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4.4.41	Essex County Council	<i>Cumulative impacts – Abnormal Indivisible Loads (“AIL”)</i> The AIL Strategy shows routes using the A12 strategic highway network and confirms National Grid are in discussions with National Highways. ECC have not been party to these discussions or with other stakeholders on the routes provided, save for the views given based on discussions with Essex Police above. However, it is understood that National Highways have restrictions on the A12 in the Colchester area at three locations – i) over the rail line north of A12, J27; ii) the bridge connecting the two roundabouts at the interchange of A12, J28; and iii) A120 slip road bridge over the A12. ECC is concerned that if the A12 cannot be used for the AILs then the Applicant may put forward a route through Colchester Town Centre. ECC would strongly oppose this route being used due to the level of disruption through the town and surrounding highway network.	The Applicant has engaged with National Highways on the proposed routes, who have provided confirmation that the three structures listed have weight restrictions imposed, but they are above the anticipated weight of the Cable Drum AIL delivery vehicle (104 t), meaning Cable Drum and Large Mobile Crane AIL access is permitted. Therefore, the Applicant does not envisage running AIL routes through Colchester Town Centre.
4.4.42	Essex County Council	<i>Cumulative impacts – Abnormal Indivisible Loads (“AIL”)</i> With reference to the potential impact of a route for AIL’s through Colchester Town Centre, there are multiple technical issues to note: i. It is not clear that there is a viable route through Colchester in terms of road widths, and height restrictions. ii. There are multiple structures through Colchester that require assessment. ECC have identified a number that require intrusive investigation works	The Applicant does not envisage running AIL routes through Colchester Town Centre, as noted above.

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		which are due to be undertaken shortly to avoid forthcoming major works. iii. Major road works are planned in Colchester at St. Boltoph's Street which would impact on any AIL route proposed through the city; iv. The maintenance regime of this route would be impacted by the AILs – not only the road construction but also the structures along it. Therefore, it would be an additional financial burden to ECC if it were used.	
4.4.45	Essex County Council	<i>Cumulative impacts – Abnormal Indivisible Loads ("AIL")</i> At present, the Applicant has been discussing the AIL routes with individual parties to gather intel but there needs to be a co-ordinated approach to ensure there are acceptable AIL routes for the scheme. The concern is that other locations have similar issues that impact on route choice through Essex. The co-ordinated approach should include discussions with all the local highway authorities (Thurrock, Essex, Suffolk, and Norfolk), National Highways and Network Rail along with input from the police.	The Applicant has been discussing and will continue to discuss AIL routeing with all Local Highway Authorities, National Highways and Network Rail, as well as with the relevant police forces. The Main Works Contractor is working to confirm the routes for AIL deliveries. Where issues have been identified, the Contractor is considering appropriate mitigation and will continue engagement with the relevant stakeholders.
4.4.46	Essex County Council	<i>Cumulative impacts – Abnormal Indivisible Loads ("AIL")</i> While there has been engagement with the Applicant's team on the status of structures along the AIL routes proposed, ECC would expect this review to have been completed prior to the end of the Examination so that workable AIL routes are defined. The following table sets out the specific locations of structures where ECC currently have concerns on the	The Contractor is currently undertaking detailed structural assessments along the selected AIL routes supported by their haulage specialist. This is dependent on the availability and adequacy of existing asset records. The Contractor is aiming to complete this by the end of the Examination process, assuming all relevant information is provided from the asset owners in a timely manner. However, this will only prove the structures are acceptable at the time of the

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		local highway network and which ongoing liaison is taking place with the Applicant's team:	assessment and identify any mitigations required. A further review will be required closer to the planned and agreed movement schedule to ensure the ALs are still suitable.
4.4.53	Essex County Council	<i>Existing Roadside Facilities</i> ECC would request that the dDCO secures that the Applicant must prior to the start of the works review proposed arrangements so that they can be based on the situation as it is at the time and any potential mitigation needed can then be identified. ECC's preferred approach would be for this work to be considered through parking usage surveys for laybys and industrial estates where clusters of HGV parking is identified, along with observations of other local roads where HGV drivers park and rest. This would be in areas on the local highway network along or within close proximity to the construction routes to determine any potential HGV parking issues. ECC suggest that the surveys would need to be undertaken prior to the start of works with possible mitigation considered in advance of construction works where necessary. Depending on the results, the mitigation could either be implemented or a monitor and manage approach adopted with regular reviews at the key locations undertaken during the construction period. An example of one known location is where HGVs Park on Mountnessing Roundabout (Roman Road/Chelmsford Road/A12).	The Applicant has provided in 8.4.1 Applicant's Comments on the Relevant Representations [REP1-132] a detailed response to paragraph 6.3.8 of the Relevant Representation by Essex County Council [RR-1083]. With regards to the suggestion that surveys be undertaken prior to the start of works, the Applicant will continue to discuss this matter with Essex County Council.
4.5.65	Essex County Council	The highest queue is on the A120 (eastbound) at Ardleigh Crown Interchange with an increase of 25 vehicles both during the peak of construction and the 85th percentile peak. The existing junction is already	The assessment of the junction modelling of Site 38 – Ardleigh Crown Interchange and Site 47 - A120 Coggeshall Rd / Great Tey Rd is presented in 7.11. Transport Assessment [APP-333] . Both junctions are

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		congested based on the output included in Appendix H.4 of the Transport Assessment. Additional queues on Tey Road are shown to be made up of 18 vehicles (12 left and 6 right) in the AM peak and minimal in the PM peak during peak construction, and 7 vehicles (5 left and 2 right) based on 85th percentile flows. However, considering this is a rural lane with existing queues (and future base flows) of around 1-2 vehicles, the effect is likely to be noticeable by regular users – particularly in the AM peak during the peak of construction.	expected to operate over capacity in the future scenarios with committed developments and the Project. Mitigation to reduce any residual impacts needs to be investigated for both junctions. The Applicant will continue to engage with National Highways and Essex County Council to discuss and agree the junction capacity mitigation measures at these sites. This will be documented in 5.9.20 Draft Statement of Common Ground - National Highways.
4.5.66	Essex County Council	<i>Junction Mitigation</i> 4.5.66 In addition, Table 7.1.21 of the TA (APP-333) includes junctions where monitoring of the operation of the junction is proposed (with Table 5.9 in the Outline CTMP (APP-309) showing that mitigation is yet to be agreed). ECC would welcome further discussion and confirmation around the principles of monitoring and what will be implemented if the monitoring identifies issues at the following locations: i. A120 Braintree Bypass/A131 Great Notley Bypass – monitor operation of junction and temporary signage to warn general traffic of peak hour congestion (Site 48) ii. A127 Southend Arterial Road/A176 Noak Hill Road – priority junction – monitor operation of junction (Site 73) iii. A1060 Roxwell Road/Lordship Road – roundabout – monitor operation of the junction (Site 69)	As noted in paragraph 5.9.10 of 7.3 Outline Construction Traffic Management Plan [APP-309], where there are instances of the junction performing under current baseline conditions, these will be discussed on a case-by-case basis with the Local Highway Authority. The intention of these meetings will be to discuss if any viable mitigation could be provided at the junctions. The Applicant will continue discuss the principles of monitoring with Essex County Council.

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		iv. A414 Greenbury Way/Highwood Road – roundabout – monitor operation of the junction (Site 71) A176 Noak Hill Road/Wash Road – priority– monitor operation of the junction (Site 74) A129 London Road/Mountnessing Road – priority junction – monitor operation of the junction (Site 82)	
4.5.68	Essex County Council	<i>Junction Mitigation</i> The results above show that there are short term and longer-term impacts at the junction in the AM peak only. ECC considers a better approach would be to restrict development traffic during the AM peak particularly in the short-term worst-case construction peak where impacts are higher. A reduction in development traffic could be introduced alongside temporary signage warning of peak hour congestion and highlighting alternative appropriate routes (to be agreed with ECC) for the longer-term impact.	7.11 Transport Assessment [APP-333] provides details of the assessment undertaken to provide detail on the potential impacts on the local highway network. The avoidance of construction traffic during peak hours has not been applied as a general mitigation measure. Several junctions are used by multiple construction access routes, and it would not be practical to coordinate all construction vehicle movements outside peak periods. It should be noted that the number of construction vehicles associated with the main and satellite compound staff could be reduced by the measures detailed within the 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311] to reduce the number of single occupancy private car trips or flexible working practices. However, the Applicant is undertaking further analysis to understand whether there are any opportunities to phase work activities differently to reduce peak hour traffic impacts. The Applicant has and will continue to liaise with Essex County Council on this matter.
4.5.70	Essex County Council	Commentary in the ES shows additional mitigation has been defined for the junctions along the road links 35-37, 49-51 and 59 and highlights that the impact would be temporary lasting only for a week	The Applicant notes the comment on road links 35-37 and 49 where additional mitigation has been proposed

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		(with the exception of PAR 59) during the peak of construction activity. Further, it is stated in paragraph 16.7.10 of the ES (Document 6.16) (APP-275) that outside of this peak construction period the construction flows would be lower but over a longer duration. It therefore concludes that the level of significance for these road links may be reduced. However, there is no further analysis to show that the significance will be less and consequently, ECC must question this conclusion. The following points are noted and suggest that the links will remain at a level of significant impact outside of the one-week duration: i. Links that have a similar level of traffic over a longer period as to the one-week period – examples include PARs 50, 51 and 59. ii. The operation of junctions on the links show congestion for both the one-week peak construction period and the longer term period even where flows are less – for example the junction modelling summarised in the Transport Assessment (Document 7.11) at Tables 7.23 and 7.24 for Site 40 in relation to PAR 35 where the RFC value remains at 1.12 for both flow scenarios.	on the junctions along these Primary Access Routes (PARs). The 7.11 Transport Assessment [APP-333] provides the assessment of the junctions along PARs 50 and 51 at Chelmsford and PAR 59 at Billericay. On those junctions that are forecast to operate at or over capacity on the future baseline scenarios during the worst-case peak period, there may continue to be some level of impact outside of that period. However, typically there is only a marginal impact upon capacity due to the addition of the Project construction traffic flows over the existing and/or future baseline scenarios. The Applicant considers that it is reasonable to conclude that the magnitude of impact outside of the worst-case peak period would be lower. The results of the modelling of Site 40 shows that the junction currently operates already over capacity during the PM peak hour and there is no predicted change in junction performance or state as a result of the Project construction flows with a change of the RFC from 0.88 to 0.93 in the AM peak and 1.07 to 1.12 in the PM peak hour. However, there is a proposal to signalise this junction as part of the planning application Colchester Northern Gateway South (reference 190665) that would form part of the future baseline scenario. The Applicant will continue to engage with Essex County Council and National Highways on this matter.
4.5.71	Essex County Council	The following road links are defined as having a significant impact on driver delay and public transport passenger delay albeit some of the junctions along them having mitigation proposed. The peak hour	Noted. The Applicant will continue to engage with Essex County Council on this matter to ensure appropriate mitigation is provided where deemed necessary on those road links where delay has been

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		flows for the peak construction period are taken from Table E.1 and E.2 from Appendix E of the TA (APP-338) and the traffic flow ranges (shown in italics below) for the longer term have been extracted from the graphs shown at the end of the document. The table below also includes where Local Cycling and Walking Plan ("LCWIP") routes are proposed which coincide with the road links that are congested offering potential to review as possible mitigation solution.	identified. The Applicant will also ensure the Mains Works Contractor(s) will engage with other projects as outlined in 7.3 Outline Construction Traffic Management Plan [APP-309] to provide a coordinated approach.
4.5.72	Essex County Council	Link PAR 37 is shown as having a significant impact on driver delay/bus passenger delay but there is no mitigation proposed. The comments in the table suggest there are existing capacity issues noted which ECC assumes relate to the Site 46 junction (A12 Eight Ash Green Interchange). Further clarification is requested on this point.	The assessment of driver delay and bus passenger delay in 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] for PAR 37 reports a magnitude of impact as major largely because the baseline number of HGVs using this route is very low (around 3%) so any increase in HGV movements during construction will show as a large proportional change in the assessment. The Applicant confirms that Site 46 A12 Eight Ash Green Interchange was initially identified as a sensitive junction on a sifting process based on existing congestion or potential capacity issues due to the increase in traffic. However, the junction modelling results presented in 7.11 Transport Assessment [APP-333] show that the junction will operate within capacity across all scenarios and time periods. The Applicant will continue to engage with Essex County Council on modelling and mitigation.
4.5.73	Essex County Council	Link PAR 49 includes mitigation in the form of temporary signage to warn motorists of forthcoming delays (as discussed above in relation to the junction	The assessment of driver delay and bus passenger delay in 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects

ID	Stakeholder	Comment	NG response
		impact at Site 63). As the driver delay for the overall link is determined as severe then ECC considers a higher level of mitigation at the junction of Site 63 is required to reduce the impact.	[APP-275] for PAR 49 reports a magnitude of impact as major largely because the baseline number of HGVs using this route is very low (around 3%) so any increase in HGV movements during construction will show as a large proportional change in the assessment. The results of the modelling of Site 63 in 7.11 Transport Assessment [APP-333] shows that the junction currently operates already at or over capacity in the future baseline scenarios and there is no predicted change in junction performance as a result of the Project construction flows, with changes of RFC from 1.02 to 1.10 in the AM peak hour and 0.91 to 0.96 in the PM peak hour. The Applicant will continue to engage with Essex County Council on modelling and mitigation.
4.5.74	Essex County Council	Link PAR 51 and 59 both include junctions that are to be monitored. These are mentioned in the previous list of junctions to be monitored but is highlighted here as the links are considered as having a significant impact where mitigation is necessary.	The Applicant will continue to engage with Essex County Council on modelling and mitigation. The assessment of driver delay and bus passenger delay in 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] for PAR 51 and PAR 59 reports a magnitude of impact as major largely because the baseline number of HGVs using this route is very low (around 2% and 1% respectively) so any increase in HGV movements during construction will show as a large proportional change in the assessment. The Applicant will continue to engage with Essex County Council on modelling and mitigation. In PAR 51, Site 69 is the only junction that operates at or over capacity. The results of the modelling of Site 69 in 7.11 Transport Assessment [APP-333] shows

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			that the junction currently operates already at or over capacity during the PM peak hour and there is no predicted change in junction performance as a result of the Project construction flows, with changes of RFC from 0.90 to 0.93 in the AM peak hour and 1.03 to 1.05 in the PM peak hour. In PAR 59, the junction modelling for Site 81 indicated that there is not a predicted change in junction performance as a result of the Project and the junction would operate marginally over practical capacity in the PM peak hour, with an increase of the Degree of Saturation (Dos) from 91% to 93.1%. A proposal of signal time optimisation would reduce the effects. The junction modelling results for Site 82 indicate a delay in the road users turning onto Mountnessing Road, due to the decrease in available space to turn from the A129 with the addition of construction traffic. The junction will operate over capacity in the AM peak hour with an increase of RFC from 0.83 to 0.91 and at capacity in the PM peak hour with changes of RFC from 0.87 to 0.88. The Applicant is proposing to monitor the performance of this junction during construction. The Applicant has and will continue to engage with Essex County Council on any additional mitigation, where appropriate.
4.5.75	Essex County Council	<i>Junction Mitigation</i> Based on the above, ECC is of the opinion that there will be impacts on the local highway network with the level of construction traffic included. Mitigation in the form of restricting construction traffic during the peak hours needs to be explored further along with the use	7.11 Transport Assessment [APP-333] provides detail of the assessment undertaken to provide detail on the potential impacts on the local highway network. The avoidance of construction traffic during peak hours has not been applied as a general mitigation measure. Several junctions are used by multiple construction

ID	Stakeholder	Comment	NG response
		of sustainable transport infrastructure to reduce background traffic and offset impacts. The impacts at these junctions also highlight the importance of controls being in place to ensure that workers do not arrive/depart site during the network peak hours which is a fundamental assumption in the transport assessment undertaken , and that suitable Construction Worker Travel Plan measures for office staff who are assumed to travel in the peak hours, are also secured.	access routes, and it would not be practical to coordinate all construction vehicle movements outside peak periods. 7.3 Outline Construction Traffic Management Plan [APP-309] provides detail of where peak hour restrictions are proposed. For junctions located within Essex, the primary mitigation measures are to monitor the operation of the junction and signal and cycle time optimisation. The Applicant will continue to liaise with Essex County Council on the suitability of these measures for mitigating the temporary construction impacts. As noted in 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311], the Travel Plan Coordinator will capture the actual shift start and end times of construction workers on site, at quarterly intervals throughout the construction programme. This will inform the monitoring report. Through this monitoring report, the Applicant will be able to demonstrate adherence to the controls put in place for workers arriving and departing from site, including the assessment assumptions.
4.5.77	Essex County Council	<i>Maintenance</i> ECC is keen to work proactively with the Applicant to resolve these issues and so ECC requests further dialogue with the Applicant around how this could be managed together with the inclusion of a commitment in the CTMP on the issue of maintenance. At a high level the following needs to be in place as a bare minimum and agreed for any maintenance regime:	The Main Works Contractor(s) will create a record of Primary Access Routes (PARs) as part of the pre-construction conditions surveys of the existing highway network. The pre-construction condition surveys are proposed to be undertaken on all Abnormal Indivisible Load and HGV routes, as detailed in Section 5.2 of the 7.3 Outline Construction Traffic Management Plan [APP-309], with the proposed methodology to be agreed with the Local Highway Authority. The results of these pre-condition surveys will be shared with the

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		i. ECC to produce a short Technical Note setting out maintenance trends prior to the start of construction using ECC data for previous years ii. The undertaker to create a record of existing PARs to identify defects on rural network prior to start of construction. Footage and written observations/information in the form of a Baseline Technical Note to be shared with ECC. iii. The undertaker to monitor road conditions through quarterly observations and recording of PARs during construction period and compile a short Technical Note reviewing current information against the baseline information. Setting out defects and how they are to be corrected iv. At the end of the construction period for the undertaker, a final review to be undertaken to compare maintenance trends over the period of construction against those included for a “standard year” in the original Technical Note produced by ECC. This should include how many defects have been noted each year compared to previous years prior to construction. v. Agreement between ECC and the undertaker on what sections of the network require additional maintenance to offset the additional “wear and tear” associated with the works. vi. The undertaker to implement the necessary additional maintenance works.	Local Highway Authority prior to works commencing, including pre-commencement works relating to the highway. Section 6.2 of the 7.3 Outline Construction Traffic Management Plan [APP-309] details how post-construction condition surveys should be undertaken after construction, and the results of these and any remedial works will be discussed and agreed with the landowner and, where applicable, the relevant highway authorities, prior to handover. The point raised by Essex County Council regarding the monitoring road conditions through quarterly observations during the construction period is noted. The Applicant will work with Essex and the Main Works Contractor(s) to agree the condition monitoring approach during construction.
4.5.78	Essex County Council	<i>Maintenance</i> In addition to the above ECC requests a commitment to a mechanism for reclaiming costs in respect of	The Applicant notes this request and will enter into discussions with Essex County Council on the subject

ID	Stakeholder	Comment	NG response
		emergency callouts relating to either damage that has occurred in the highway as a result of the construction (within the vicinity of the site accesses) or Traffic Management issues associated with the scheme. This is on the basis that the level of activity and type of vehicle associated with the works on the rural network will be beyond usual adverse conditions.	of emergency callouts that could reasonably be attributed to the Project.
4.5.80	Essex County Council	<i>Maintenance</i> ECC is provisionally looking to fund and implement a new road safety scheme on A1060 Roxwell Road which will include average speed cameras. In the Relevant Representations we previously highlighted that there were concerns around the impact of the Norwich to Tilbury construction route on this link. Should, the scheme be outstanding prior to the Norwich to Tilbury works commencing then we would seek a commitment from the Applicant to implement the aforementioned road safety scheme prior to construction.	The Applicant assessed the impact of the Project on the A1060 Roxwell Road and set out in 7.3 Outline Construction Traffic Management Plan [APP-309] its proposed mitigation measures, which it considers to be sufficient and proportionate. The Applicant is now in discussions with Essex County Council regarding the potential new road safety scheme for the A1060 Roxwell Road that Essex County Council has highlighted in its LIR. The Applicant is also reviewing the relationship of the safety scheme to the Project. The Applicant will continue to work with Essex County Council to understand the commitment that Essex County Council is seeking in relation to the A1060 Roxwell Road.
4.5.81	Essex County Council	<i>Road Safety</i> ECC has reviewed all the PARs and identified a number of locations where it is considered the Applicant should make road safety improvements to mitigate the scheme. The following tables includes commentary on potential works the Highway Authority feels could be appropriate: 1. Botney Hill Road/Farm Access – Potential to improve surfacing	The Applicant assessed the impact of the Project on the Primary Access Routes (PARs) and set out in 7.3 Outline Construction Traffic Management Plan [APP-309] its proposed mitigation measures, which it considers to be sufficient and proportionate. The Applicant will consider the new information provided in the LIR (road safety improvements recommended by Essex County Council (ECC) in relation to the Project). The Applicant will continue to work with ECC to understand the scale of each

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		2. B1002 (between Ingatestone and Margaretting) – Fast moving road. Potential to drop to 50mph	scheme, the relationship to the Project including timescales, the priorities and contributions requested.
		3. Ongar Road (near Hanging Gardens Nurseries) – Contribution to chevrons	1. Botney Hill Road/Farm Access – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC.
		4. Roxwell Road/Vicarage Road - Vegetation maintenance within visibility splay envelope for the duration of the works	2. B1002 (between Ingatestone and Margaretting) – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC.
		5. B1018 nr Temple Barns – average cameras around loss of control on bend – Vegetation clearance and improved signage scheme	3. Ongar Road (near Hanging Gardens Nurseries) – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC.
		6. A134 Nayland Road, Horkesley – Speed limit reduction	4. Roxwell Road/Vicarage Road – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC.
		7. Wick Lane/Dead Lane - Vegetation clearance within visibility splay envelope for the duration of the works	5. B1018 nr Temple Barns – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. ECC is collating further information to send to the Applicant.
		8. A129 - potential for speed reduction	6. A134 Nayland Road, Horkesley – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. ECC to confirm the speed limit reduction that it is seeking.
		9. A414 Three Mile Hill (off A12) – Average speed cameras	7. Wick Lane/Dead Lane – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC.
		10. Margaretting - Speed reduction to 30mph	8. A129 – The Applicant is discussing with ECC these potential highway works to understand the case
		11. Cuckoo Wood (A131) - VAS Signage	
		12. Galleys Corner – Potential contribution towards a bigger scheme Decent footway provision south of new RB providing links to school	

ID	Stakeholder	Comment	NG response
			being made by ECC. ECC is collating further information to send to the Applicant. 9. A414 Three Mile Hill (off A12) – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. ECC is collating further information to send to the Applicant. 10. Margaretting – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. 11. Cuckoo Wood (A131) – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. ECC is collating further information to send to the Applicant. 12. Galleys Corner – The Applicant is discussing with ECC these potential highway works to understand the case being made by ECC. ECC is collating further information to send to the Applicant.
4.5.85	Essex County Council	Fear & Intimidation as defined in the in the Environmental Assessment and Movement Guidelines (Institute of Environmental Management and Assessment (IEMA), July 2023) also mentions undertaking a qualitative review alongside the suggested thresholds. Currently Table A16.4.6 of the ES includes consideration against thresholds only. ECC therefore believes that site conditions have not adequately been considered, in particular, the effective footway width. The impact of a narrower footway means pedestrians are closer to the	The assessment for the pedestrian, cyclist and horse-rider fear and intimidation presented in Table A16.4.6 of the 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] has been based on the sensitivity established for the pedestrian, cyclist and horse-rider Amenity and a weighting system defined in the IEMA Guidelines Environmental Assessment of Traffic and Movement (2023)⁸⁴. This therefore included a qualitative review and assessment of the adequacy of the provision of footways on the Primary Access

⁸⁴ Institute of Environmental Management and Assessment (IEMA) (2023) *IEMA Guidelines: Environmental Assessment of Traffic and Movement*

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		carriageway where HGVs are travelling on the construction route. Examples of the PARs impacted by Fear & Intimidation guidance are the same as those related to amenity (i.e. PARs 37, and 41-43). However, as for pedestrian amenity ECC suggest that the Applicant reviews all the PARs in the table to ensure all locations have been appropriately assessed.	Routes (PARs) in the definition of the sensitivity of the road links. The Applicant considers that the existing conditions have been appropriately reflected in the assessment methodology and conclusions. For example, for PAR 37 A1124 Halstead Road mitigation has been proposed within the 7.3 Outline Construction Traffic Management Plan [APP-309] to address the impact on Amenity and Fear and Intimidation. This included a driver information pack which will identify locations where pedestrians may be walking either on a verge or carriageway, ensuring adjacent vegetation is maintained to keep verge clear and allow the full width of footway to be utilised, and placing signs to warn drivers of upcoming pedestrians in road ahead crossing the carriageway. For PAR 41 there are verges of various widths located alongside the carriageway through rural sections and with limited trip attractors apart from Public Rights of Way (PRoWs); where pedestrians are likely to cross the carriageway to reach the opposite PRoW, it is unlikely that pedestrians would walk along the PAR itself which has a speed limit of 50 mph. Within the urban areas footways are provided with small sections of low level vegetation encroachment from adjacent verge. The residual construction significance of effects would therefore be slight adverse, temporary, and not significant. For PAR 42 and 43 there are a few localised short sections of footway that are narrowed by existing low level vegetation / encroachment from an adjacent verge that could be utilised. The increase in construction traffic on these PARs is notably low (17 HGVs an hour – 9 in each direction). The residual construction significance of effects is therefore

ID	Stakeholder	Comment	NG response
			considered to be slight adverse, temporary, and not significant. The Applicant will continue to engage with Essex County Council on this matter regarding the need for further mitigation in the form of vegetation clearance/'siding out' of existing footways and maintenance of verges.
4.5.86	Essex County Council	<i>Environmental Assessment Mitigation</i> To deal with the points above, ECC suggests that the commentary is updated (or inserted for the Fear & Intimidation Guidance) in Tables A16.4.5 and A16.4.6 to highlight the lack of effective footway width and the mitigation proposed. ECC also suggests that the mitigation includes vegetation clearance as well as 'siding out' to remove the dirt/mud/debris overspill on the footway.	The Applicant notes this comment and has and will continue to engage with Essex County Council on this matter regarding the need for further mitigation in the form of vegetation clearance/'siding out' of existing footways and maintenance of verges.
4.5.87/4.5.88	Essex County Council	<i>Environmental Assessment Mitigation</i> The following PRowWs enter rural lanes where there is potential for pedestrians in the road or waiting on verges as there is a lack of footway. In the interests of safety, these require vegetation clearance and warning signage in line with the others identified in Table A16.4.5 (for example, PAR 43): PAR 39 Great Tey Road vii. PAR 41 Witham Road (B1018) viii. PAR 51, Roxwell Road ECC therefore suggests that the Applicant checks the PRow network when reviewing the effective footway width in relation to Table A16.5.6 to make sure that all locations are covered.	The Applicant notes this comment and has and will continue to engage with Essex County Council on this matter regarding the need for further mitigation in the form of vegetation clearance/'siding out' of existing footways and maintenance of verges.

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4.5.89	Essex County Council	<i>Environmental Assessment Mitigation</i> There are existing traffic calming features on Spa Road, Witham (PAR 43) which will need to be reviewed in order to be satisfied HGV's can be accommodated. The location is around 100m north of Spa Road/Humber Road. The road width has been narrowed with kerb build outs and a splitter island. ECC have concerns that the traffic calming feature will be impacted by the uplift in HGVs using the route. In the interests of both pedestrian and vehicle safety, ECC require that the Applicant reviews this through auto track analysis and provide mitigation proposals if appropriate.	The location noted on Spa Road in Witham is identified in 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans [APP-317] (Section E, Sheets 5 and 6, Constraint E7). This indicates that it is proposed for street furniture to be removed from the location temporarily in order to accommodate the design vehicle movements. Mitigation in the form of an appropriate traffic management arrangement (layout) will be agreed with the Local Highway Authority and put in place to replace the street furniture temporarily removed.
4.5.90	Essex County Council	<i>Impact on ECC Depot, Ardleigh</i> The ECC Depot in Ardleigh located on Harwich Road (A1337) close to its junction with Little Bromley Road is the main highway dept for the north of the County providing general maintenance and reactive services 24/7, 365 days a year. It is noted that the proposed route oversails the depot and its construction will require access and for structures to be potentially placed in the depot yard. This could potentially have a significant impact on the operation of the depot which would have serious implications for the maintenance and function of the County highway network.	Noted
4.5.91	Essex County Council	<i>Impact on ECC Depot, Ardleigh</i> In this regard, it is important to note that access for all vehicle types are required at all times up to and including a gritter vehicle (worst case vehicle type). ECC has engaged with the Applicant on this issue and requires confirmation in the CTMP.	There are proposed road closures with diversions in the vicinity of the Essex County Council Depot in Ardleigh, with diversions of the A137 Harwich Road, Home Farm Lane and Little Bromley Road as detailed in 2.4 Traffic Regulation Order Plans - Section C [APP-027], 2.5 Access, Rights of Way and Public

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			Rights of Navigation Plans - Section C [APP-035] and in Schedules 6, 8 and 13 in 3.1 Draft Development Consent Order [APP-056]. 7.3 Outline Construction Management Plan [APP-309] provides information on traffic management. Given that access to the depot would be required at all times, the Contractor has a duty to provide 'access only' arrangements for Essex County Council access and egress, and the specifics of this would be confirmed through engagement between the Contractor and Depot staff and captured within the in agreement with the Local Highway Authority following the change process outlined within 7.3 Outline Construction Traffic Management Plan [APP-309]. The works would also all be managed through the permit scheme by the Contractor.
4.5.92	Essex County Council	<i>Impact on ECC Depot, Ardleigh</i> Further clarity is also required concerning road closures in the area which might also impact on access and response times. ECC therefore needs reassurance on what arrangements will be in place to ensure continuous access.	Ardleigh Road is scheduled for short-term temporary road closures to enable highway works such as construction of bellmouths, and for overhead line works such as stringing activities. These are outlined in 7.3 Outline Construction Traffic Management Plan [APP-309], along with information on traffic management. The Applicant acknowledges that access to the depot will be required 24/7, and the Main Works Contractor(s) will have a duty to provide 'access only' arrangements for Essex County Council and emergency services access and egress to the site. Details of the access arrangements are to be confirmed through engagement between Essex County Council and the Main Works Contractor(s).

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4.5.98	Essex County Council	<i>Design of Vehicle Accesses and Crossover Points on the Highway Network</i> ECC's concern is whether there is sufficient depth of construction in the existing carriageway for the widening works to tie into, and that it can accommodate the volume of construction traffic.	The Contractor is required to undertake suitable intrusive surveys in order to design adequate and compliant widening. Essex County Council will be a key stakeholder in reviewing and approving the design prior to construction.
4.5.99	Essex County Council	<i>Design of Vehicle Accesses and Crossover Points on the Highway Network</i> In general, ECC is seeking a realistic approach of self-enforceable speed limit changes where possible that will set up the network for success. Simply making an order for a Traffic Regulation Order ("TRO") to reduce a speed limit does not automatically mean compliance by the Highway user. ECC has concerns in terms of safety that some of the designs do not include a realistic speed limit. In addition, the access design should be informed by the observed speeds of the road in terms of visibility splays. The TRO order should not be used as a tool for situations where appropriate visibility splays cannot be achieved; instead, alternative locations with appropriate visibility splays should be considered.	The Applicant concurs with Essex County Council's stated position that – where achievable – proposed speed limits should broadly be self-enforcing. The Applicant is also aware of concerns expressed by Essex County Council relating to specific locations where it may not necessarily be practicable to achieve a self-enforcing speed limit, and will continue to engage with Essex County Council and other stakeholders as appropriate with a view to ameliorating such concerns. The Applicant has sought to include proposals for Traffic Regulation Orders (TROs), including where these relate to reductions in posted speed limits, in support of the safe and effective provision of site access, crossover, and mitigation proposals interfacing with the Public Highway. This approach is outlined in 7.3 Outline Construction Traffic Management Plan [APP-309]. Designs relating to these locations have been subject to the Road Safety Audit (RSA) process – with oversight from the relevant Local Highway Authorities for each area of the scheme – set out in 7.11 Transport Assessment - Appendix A – Norwich to Tilbury RSA Strategy [APP-334]. This process included consideration of both posted speed limits and, where available, speed survey information. Survey

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			locations are shown in 7.11 Transport Assessment – Appendix I – Figures [APP-342] – noting that Project traffic count surveys also included the recording of speed information, as discussed in 6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271] . On this basis, proposed TROs are considered to broadly account for driver behaviour in a suitable and realistic manner.
4.5.101	Essex County Council	<i>Design of Vehicle Accesses and Crossover Points on the Highway Network</i> Wick Lane (PAR 32) includes a proposal for temporary traffic lights to enable construction vehicles to travel between two site access points as part of a haul road route. Wick Lane is a narrow, rural lane with existing 12-hour daily traffic flows of 1,193 vehicles. The proposals show around 80-100 daily HGVs over a period of a year, and short-term peaks of 140-160 HGVs over 5-6 months and 20-40 HGVs over approximately 20 months using the route (based on Image A16.4.32 in the ES Appendix 16.4 (Doc 6.16)). The concern is that the traffic lights will cause vehicles using Wick Lane to queue at either end, and when released will meet as platoons of traffic from either side at the narrow sections of Wick Lane causing blockages. Or, if released separately will not be able to pass the queues either end. ECC understands the reason this option has been pursued is due to the Ardleigh Reservoir severing both parts of the site. However, there do appear to be other options available that ECC would request the Applicant considers. It has not been demonstrated to us that the	With regards to the safety concerns raised, we propose to install a set of 4-way traffic lights to manage construction traffic joining the public highway. This will be located; i. On the haul road at the junction with Wick Lane, ii. On Wick Lane at the junction with the Haul road, iii. On Lodge Lane at the junction with Wick Lane, and iv. On Wick Lane at Ardleigh reservoir bridge. The decision was taken to use a traffic management solution instead of widening the lane, due to the poor forward visibility and the additional vegetation removal and land take outside of the Essex CC ownership. Our assessment of the impact of the traffic lights on movements indicates that with a 96-second cycle time, predicted queues at either end are expected to remain below 5 PCUs (Passenger Car Units), indicating sufficient capacity for the proposed construction and existing flows. This is below the limits stated within the Traffic Signs Manual Chapter 8. National Grid has undertaken a Stage 1 Road Safety Audit (RSA) on the proposals. The Local Highway Authority (Essex CC) has reviewed the Stage 1 RSA

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		design and use of traffic signals is feasible and as such we do not support the approach taken.	and has responded that it is content that the proposals are safe. We note Essex's concerns at this location. The Applicant's appointed Main Works Contractor is undertaking a more detailed assessment at this location. They will consider additional options as suggested by Essex County Council and will continue to engage with them on this matter.
4.5.102	Essex County Council	<i>Design of Vehicle Accesses and Crossover Points on the Highway Network</i> Concerns have been consistently raised with the Applicant around anti-social behaviour due to speeding as a result of the permanent widening on Ardleigh Road/Bentley Road. Ardleigh Road is a relatively narrow, rural lane with verges and open fields either side, operating under a national speed limit. It is clear from observations that there are informal areas that appear to be used by drivers to enable vehicles to pass each other. The proposal includes permanently widening the section of the road to 6 metres between the private haul road, introduced between Bentley Road and Ardleigh Road, and the site access to the EACN Substation (junction ref B070 from Figure 1 (page 17 of 30) of TA (Doc 7.11) to enable occasional HGVs to access the site during the operational phase but also, temporarily, for the duration of the construction phase with higher HGV flows and access for AILs. In addition, the proposal includes reducing the speed limit to 30mph (as set out in TRO Schedule 13 of Draft DCO). ECC believe the permanent widening will encourage higher speeds over this 1km of relatively straight section of road	The widening scheme relating to Ardleigh Road referenced by Essex County Council is, as stated, intended to facilitate both construction and operational access to the proposed East Anglia Connection Node (EACN) Substation. The section of Ardleigh Road which would be impacted by the proposals is shown in 7.3 Outline Construction Traffic Management Plan - Appendix C – Indicative Highway Mitigation Plans – Section C [APP-315], Sheet 15. The operational requirement for retaining the full proposed width of the carriageway is based on the need to maintain a route suitable for the Transformer Delivery Abnormal Indivisible Load (AIL) (as set out under 7.3 Outline Construction Traffic Management Plan - Appendix A - AIL Strategy [APP-310]) in order to facilitate potential future delivery if a 'secured event' were to occur during the operational life of the proposed substation under the National Electricity Transmission System Security and Quality of Supply Standard, as noted in paragraph 2.7.12 of 7.11 Transport Assessment [APP-333]. In developing the proposed access strategy, the Applicant considered a number of access options for the proposed EACN Substation. A summary of options

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		leading to anti-social behaviour, and on a day-to-day basis that the speed limit will not be self-enforcing. This would leave ECC with a legacy issue to deal with as a result of the changes. ECC requires further consideration from the Applicant on incorporating design features to the proposed design to facilitate lower speeds and to discourage anti-social behaviour, and/or a review of the access strategy to determine other options.	is included within Table 3.19 of 6.3 Environmental Statement Chapter 3 – Alternatives [APP-127]. The Applicant is aware of concerns expressed by Essex County Council with respect to the permanent operational arrangement of this widened section of Ardleigh Road. The Applicant will continue to engage with Essex County Council, and other relevant stakeholders, with a view to proposing suitable measures to address the noted operational concerns in this area. The option of increasing the permanent speed limit reduction along Ardleigh Road from 30 mph to 40 mph is being explored as a modification to the Development Consent Order application. Should residual risks be identified following this increase, the Applicant shall, through future engagement with the Local Highway Authority at detailed design, consider implementing permanent highway features to safely promote self-enforcement of the reduced speed limit, whilst not impeding use of the access route by the necessary design vehicles.
4.5.103	Essex County Council	<i>Design of Vehicle Accesses and Crossover Points on the Highway Network</i> In ECC's Relevant Representation (RR-1083), ECC identified that the new permanent private haul road between Bentley Road and Ardleigh Road crosses two existing PRow and that as a result, ECC required more surety on the design and protection of rights. The Applicant has suggested that this level of detail will be provided at a later stage and that as they have control of the land either side of the haul road there would be adequate space to provide for public rights of way users.	The two existing Public Rights of Way (PRow) that cross the permanent private access road between Bentley Road and Ardleigh Road cross the access road at an angle. The intention is therefore for them to be subject to very minor permanent diversions to create new, safer perpendicular crossing facilities. The sections of the PRow to be permanently stopped up, together with the proposed alignments of their associated diversions, are shown on the 2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-033 to APP-040 inclusive]. As detailed design progresses, the precise alignment, length and

ID	Stakeholder	Comment	NG response
			specification of the permanent diversions and crossing will be developed in consultation with the Local Highway Authority PRow Officer, and any resulting proposals would be in accordance with appropriate and relevant design standards.
4.5.104	Essex County Council	<i>Traffic Regulation Orders</i> ECC formally objects to the draft Traffic Regulation Orders listed in Schedule 13 as we have not received sufficient information. The Traffic Regulation Orders are not agreed as we are awaiting further information on traffic flows and speeds (requested by ECC in June 2025) on the diversion routes proposed, as well as the routes or junctions where there are to be a reduction in speeds as part of the traffic management controls. Parking surveys have also since been requested to justify the commentary on the potential for impacts on parking and loading bays in Table A16.4.7 of the ES (Doc. 6.16). The parking assessment is currently based on assumptions on use which should be verified to understand the potential for impacts on the local community - particularly in locations where residents rely on parking on street.	The Applicant would welcome further engagement with the Local Highway Authority to discuss the detail, form and durations of the draft Traffic Regulation Orders (TROs) in Schedule 13. The Applicant has conducted traffic and speed surveys in the locations of proposed Site Access Points and Crossover Points. This data has been considered within the design of these locations and the proposed implementation of any speed limit restrictions. During construction of the Site Access Points, Crossover Points and highway mitigation works, there may be works where it is not safe or practicable for the public highway to remain fully available for use. During these limited periods, the Applicant would seek to maintain access through the deployment of traffic management. Should this not be feasible or operationally reasonable, due to factors such as limited existing carriageway width, the Applicant would seek to implement a limited duration closure. In addition, short-term road closures are required for netting activities associated with the overhead line stringing. These closures are of very short duration (hours rather than days) and can occur at night, further limiting potential disruption. Due to the limited duration and occasional nature of these potential closures, the Applicant does not consider it appropriate to conduct traffic flow or speed

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			surveys along diversion routes, in line with typical temporary road closure procedures. Given their limited carriageway width, generally the closures will be required on more minor local roads, and therefore it is anticipated that there will be a limited traffic flow impact resultant from these closures. Additionally, the use of diversion routes would not change the existing road speed conditions to trigger the requirement to obtain speed data along these routes. All works will be coordinated with the Local Highway Authority by the Main Works Contractor through the use of the permit scheme. The Applicant has and will continue to work with Essex County Council regarding the requirement for further survey work in relation to on-street parking.
4.5.106	Essex County Council	<i>Traffic Regulation Orders</i> The Local Highway Authority's main concerns are: i. The TRO should include the duration of the orders so as to fully understand the impacts ii. There should be a statement of reasons for the orders so that we can understand what is trying to be achieved so ECC can review against the necessary specific and relevant orders that are to be implemented and to understand the purpose (for example, restricted access) iii. The key on the plans only shows temporary orders – there does not appear to be a differentiation between temporary and permanent orders on the plans therefore the proposals are unclear.	i. Traffic Regulation Order (TRO) durations – The works programme is yet to be finalised, along with the requirements of commencement dates, so durations of all TROs are unable to be confirmed at this time. ii. The 7.3 Outline Construction Traffic Management Plan [APP-309] sets out details and reasoning for consideration by the contractor relating to traffic management and TROs, including references to Local Highway Authority permit scheme, and lengths (distance and duration) of traffic management measures. The Applicant will continue to engage with the Local Highway Authority on the reasons for the TROs. iii. The key on the 2.4 Traffic Regulation Order Plans (Sections A to H) [APP-025 to APP-032]

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		iv. More detail is required on how the TROs will be enforced and maintained – for example, advanced warning signage and traffic management. v. Confirmation that the diversion routes have been checked for weak structures, width, height and environmental restrictions. vi. The mechanism for reviewing road closure diversion routes at the time - taking account of the latest information on the capacity of structures in advance of them being used and checks on other restrictions. vii. A mechanism for scope to change diversion routes if needed – taking account of other works in the area for example at the time, or where structural capacity issues have been highlighted or new restrictions implemented. viii. Whether some of the speed reductions are necessary as the speed data may show that there are low speeds already occurring.	inclusive] presents in their Legend whether the TROs are either temporary or permanent, Additionally, Part 4 of Schedule 13 of the 3.1 Draft Development Consent Order [APP-056] lists all permanent TROs for the Project, whereas Parts 1 to 3 lists all temporary TROs. iv. TRO enforcement – Traffic enforcement in Essex is primarily carried out by the Essex Police for speed enforcement and enhancing road safety, and by the Essex County Council for traffic-related services. Maintaining the TROs – The 7.3 Outline Construction Traffic Management Plan [APP-309] Table 6.1 provides indicative timescales and responsibility for monitoring of/checking signage, vehicles and road network. Traffic Management is set out within Section 5.8 of 7.3 Outline Construction Traffic Management Plan [APP-309]. The Applicant's Main Works Contractor is to develop traffic management proposals including signage in accordance with the 7.3 Outline Construction Traffic Management Plan [APP-309] which are to be agreed with the Local Highway Authorities. v. The diversion routes have been identified following typical road closure procedures, where diversion routes are a similar or better standard than that to be closed in terms of alignment, carriageway width, height and weight restrictions. vi. A mechanism for scope to change diversion routes – Section 2.4 Consents, Licences and Permits, and Section 6.5 Community Liaison of the 7.3 Outline Construction Traffic Management Plan [APP-309] Section 2.4 Consents, Licences and Permits,

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			and Section 6.5 Community Liaison provides references use and adherence of Local Highway Authority Permit Schemes, in order to best coordinate the street works required for the Project. Details for Contingency Routes where circumstances may require a change in diversion route/s are included within the 7.3 Outline Construction Traffic Management Plan [APP-309]. vii. The 7.11 Transport Assessment - Appendix A – Norwich to Tilbury RSA Strategy [APP-334] sets out the reasoning behind decisions for the preliminary designs, being based on 85th percentile speed survey data, site-specific constraints and highway safety considerations together with other measures in combination to determine the suitable design speeds as listed with Schedule 13 of the 3.1 Draft Development Consent Order [APP-056] for TRO speed restrictions. The Applicant will continue to discuss the TROs with Essex County Council.
4.5.108	Essex County Council	<i>Traffic Regulation Orders</i> ECC also considers this information should be provided prior to the completion of the examination as it is important that the TROs are agreed in advance – particularly as it is understood there will be no further ability for ECC to influence the TROs post DCO.	7.3 Outline Construction Traffic Management Plan [APP-309] sets out that where diversions are necessary (due to temporary closure of roads), they will adopt the principle that they will use the same standard of road, or higher where practicable and available. The Applicant has applied this principle when selecting diversion routes and has provided information consistent with that of consented Development Consent Orders. The Applicant will nonetheless continue discussions with Essex County Council

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			regarding the Traffic Regulation Orders to understand any concerns about specific diversion routes.
4.5.109	Essex County Council	<i>Financial Agreement</i> It is clear that some form of agreement is required to ensure appropriate funding is available to cover the time that ECC officers will need to spend in providing oversight of the various mitigation and commitments that have been included in the DCO documentation, as well as the points raised in this Local Impact Report. ECC would welcome a discussion with the Applicant on how this can be achieved so that any costs involved in supporting the implementation of the Project are cost neutral to ECC as our policy states.	The Applicant will begin discussions with the host local highway authorities and National Highways before Deadline 3 on the recovery of appropriate costs through a Planning Performance Agreement (PPA).
4.5.10	Essex County Council	<i>Financial Agreement</i> Listed below is a summary of matters that ECC consider will need to receive funding in some form which we do not believe is currently allowed for in the dDCO or standard ECC processes: i. Review of monitoring – route adherence, HGV numbers, Outline Construction Worker Travel Plan (“CTWP”) (APP-311) targets, pre and post construction condition surveys, junction operation (mitigation); ii. Discussions on CTWP measures following review of monitoring; iii. Administering requests for repairs to highway where condition survey shows issues; iv. Maintenance review and discussions around potential improvement works and costs;	The Applicant acknowledges Essex County Council’s summary of matters and will take it into account during forthcoming discussions with Essex County Council on recovering appropriate costs through a Planning Performance Agreement (PPA).

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		v. Highway Checks – observations of routes and impacts including liaison with Members, Parish Council, Contractor, and Members of the Public; • PRoW network discussions; vi. Road Safety Review; vii. Discussions on structures in relation to AILs and HGV routes;	
4.5.112	Essex County Council	<i>Summary (of Highways & Transportation including Public Rights of Way (PROW))</i> The Applicant is strongly encouraged to engage with the Local Highway Authority on the matters set out within this LIR to ensure necessary mitigation and controls are in place to effectively manage the impacts arising from this development on the highway network.	The Applicant will continue discuss mitigation and controls for managing impact on the Local Highway Network with Essex County Council.
6.20.4	Essex County Council	<i>Outline Construction Traffic Management Plan (Final Issue A) (APP-309)</i> While there are currently no planned schools on the PARs, ECC requires a commitment in the outline CTMP to include a review at the time of construction. This is to take account of any slippages in the programme which may coincide with new schools that are linked to new developments.	The Applicant will continue discussions with Essex County Council regarding the interface of the Project with any new schools that are linked to new developments.
6.20.5		<i>Outline Construction Traffic Management Plan (Final Issue A) (APP-309)</i> ECC notes there is no commitment in the CTMP for the contractor to consider ways of reducing freight by road which is a clear national policy requirement set out in NPS EN1 paragraph 5.13.14. ECC would expect this to be included in	National Policy Statement EN-1 (2024), paragraph 5.14.12 details that '<i>all stages of the project should support and prioritise a modal shift of freight from road to a more environmentally sustainable alternative.</i>' 7.11 Transport Assessment - Appendix G - Multi-Modal Transport Report [APP-340] provides detail of the assessment undertaken by the Applicant, to

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		the CTMP with high level items included that should be considered by the Contractor such as the use of consolidation centres, working with other developers on shared delivery logistics (this could form part of the Developer's Forum discussions), alongside the wider considerations of the Multi-Modal Strategy using rail and port facilities to replace long distance road freight.	reduce the amount of distance travelled on road by freight vehicles. The Applicant and the Main Works Contractor(s) are continuing discussions with the operators of multi-modal sites, with the intention of these being used to source materials where possible. The Applicant has committed to engage with the Developer's Forum and is happy to discuss with other developers the opportunities to reduce long distance road freight deliveries.
6.20.6	Essex County Council	<i>Outline Construction Traffic Management Plan (Final Issue A) (APP-309)</i> ECC has reservations on the front-loaded delivery profile option (Scenario 1) shown in Appendix G of the Transport Assessment (APP-340) for the Multi Modal Strategy as this has the potential to be more disruptive to the local highway network compared to the 'just-in-time' scenario (Scenario 2). However, ECC recognises the challenges and is open to discuss this further when a more detailed programme is available and more information is provided by the Contractor on the expected duration of impacts at specific locations. ECC would request that this is noted in the CTMP as a point for discussion between the Highway Authority and the Contractor	The front-loaded scenario was included within the assessment detailed in 7.11 Transport Assessment [APP-333]. This was completed to understand if any additional mitigation, above the 'just-in-time' scenario was required on road links from the Ports to the Primary Access Routes (PARs). The shorter timeframe in the front-loaded scenario resulted in higher impacts on the PARs but experienced over shorter periods of time. The Applicant and Main Works Contractor(s) will continue discussions with the Local Highway Authority when additional information on sourcing is available. The monitoring and management principles detailed in 7.3 Outline Construction Traffic Management Plan [APP-309] are applicable to either scenario, with the Main Works Contractor(s) monitoring the number of HGVs accepted into site. The Applicant will adhere to the National Policy Statement EN-1 (2024), paragraph 5.14.13 requirements and will continue to engage with Essex County Council during the development of material sourcing. The Applicant does not consider the 7.3 Outline Construction Traffic Management Plan

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			[APP-309] to be the appropriate document for securing this requirement.
6.20.9	Essex County Council	<i>Outline Construction Traffic Management Plan (Final Issue A) (APP-309)</i> In addition to the above points that are noted for the existing network, it is requested that a commitment to a road safety review of the construction routes is included in the CTMP which includes a review of structures.	The Applicant will continue engagement with Essex County Council to understand the requested commitment.
6.20.10	Essex County Council	<i>Outline Construction Traffic Management Plan (Final Issue A) (APP-309)</i> ECC would also request that the CTMP includes a commitment by the Contractor to remain flexible with the use of the construction routes to take account of external factors that may impact on the operation of the local highway network.	As stated within 7.3 Outline Construction Traffic Management Plan [APP-309] the use of contingency routes is proposed in circumstances where traffic movements on the road network are compromised, including the use of the agreed Primary Access Routes and Site Access Points. Contingency routes will be provided by pre-established traffic diversions and diversions set out by National Highways, the Local Highway Authority and the police.
6.20.11	Essex County Council	<i>Outline Construction Traffic Management Plan (Final Issue A) (APP-309)</i> ECC requires the Applicant to include a commitment in the CTMP that the Contractor will undertake a comprehensive investigation of the construction of Bentley Road to inform the subsequent detailed design for the works.	The Applicant notes this comment and confirms that the Main Works Contractor(s), in partnership with North Falls and Five Estuaries, will undertake a comprehensive investigation of the construction of Bentley Road to inform and coordinate the detailed design of the works.
6.20.12	Essex County Council	<i>Outline Construction Traffic Management Plan (Final Issue A) (APP-309)</i> ECC would welcome engagement with Applicant to ensure the proposals set out within this response are properly considered and the requisite amendments	The Applicant will continue engagement with Essex County Council to mitigate impact on the road network and amendments to the Construction Traffic Management Plan.

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		made to the CTMP, to the satisfaction of the Local Highway Authority, to ensure the impact on the road network arising from the project can be appropriately controlled.	
6.21.5	Essex County Council	<i>Appendix B – Outline Construction Worker Travel Plan (APP-311)</i> The existing site accessibility shown at Chapter 4, Table 4.1 indicates limited ability for staff to access active travel options due to the rural nature of the site compounds; rail and bus is presented as almost non-existent. The accessibility for rail has been presented based on whether staff can access the site using a bus route from the station but in many cases, a train station is nearby the site. One measure therefore, that ECC would want included as a commitment in the outline CTMP to mitigate the impact on local highway networks is to have mini buses to pick up/drop off between the site and various key locations/transport nodes. This would connect staff with locations such as train stations, bus stops and shared accommodation, or other locations where there are clusters of staff. Those using the mini-bus could also have priority leaving the site at the end of the day to encourage uptake.	The Applicant notes this comment. As the locations of construction staff are not yet known, it is not currently possible to accurately identify which public transport corridors/hubs are likely to experience high usage. When additional information is available, discussions will be undertaken to identify opportunities to support multi-modal public transport journeys to site. Should a minibus or shuttle service from local public transport hubs be identified as a measure, further detail will be included in the final Construction Worker Travel Plan.
6.21.6	Essex County Council	<i>Appendix B – Outline Construction Worker Travel Plan (APP-311)</i> The CWTP includes car sharing as a measure to reduce vehicles to the site. However, there is a lack of detail demonstrating proactive commitment around how it will be implemented. For example, engaging with staff prior to them travelling to site is an important part of the process so that vehicle numbers are	The Main Works Contractor(s) will develop the final Construction Worker Travel Plan. It is expected that within this process, they will engage with the Local Highway Authorities on the appropriate methodologies to encourage construction workers to travel to the site via more sustainable modes. Best practice from other Development Consent Orders will be used to inform this discussion.

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		reduced from the beginning helping to establish travel patterns early on. More detail should be provided as to how the Contractor would go about proactively identifying clusters of staff and/or transport hubs to assist with reviewing minibus drop off/pick up options, alongside encouraging car sharing; and how this would be promoted to the staff to encourage a high take up.	The location of construction staff is currently unknown. Once this information becomes available, it is expected that the Main Work(s) Contractor and Travel Plan Coordinator will identify clusters to inform the proposed staff mitigation measures, where required. This could include the provision of a minibus and other measures.
6.21.7	Essex County Council	<i>Appendix B – Outline Construction Worker Travel Plan (APP-311)</i> At paragraph 7.2.2 of the CTMP there is a commitment to providing an information pack which includes details of the Travel Plan to be included as part of induction onto the project. This is acceptable if the induction is to take place prior to staff being on site – if it is not, then the information pack should be provided beforehand so that staff think about travel beforehand and have assistance in making decisions about how they travel (particularly noting the minibus and car share measures). How the site is accessed could also be included in the recruitment process so that staff would understand the measures before committing to working.	In line with the Construction Design and Management Regulations 2015, the Main Works Contractor(s) will ensure every worker is provided a suitable site induction before starting construction work. As set out in paragraph 7.2.2 of the 7.3 Outline Construction Traffic Management Plan – Appendix B - Outline Construction Worker Travel Plan [APP-311], the information pack will be issued to sub-contractors upon appointment and incorporated into their Project induction. The subcontractor will be encouraged to share this information with staff as early as practicable to support staff travel choices.
6.21.9	Essex County Council	<i>Appendix B – Outline Construction Worker Travel Plan (APP-311)</i> The above principles on parking are welcomed, but ECC considers further commitments are required for inclusion in the outline CTMP to detail the parking demand, and the supply of parking being provided together with the access design to the compounds. This must also be supplemented with cycle parking details. Also, it is requested that the site-specific	The Applicant notes this comment. Section 7.6 of the 7.3 Outline Construction Traffic Management Plan – Appendix B - Outline Construction Worker Travel Plan [APP-311] sets the initiatives that will be implemented by the Travel Plan Coordinator (TPC) to encourage cycling, including the provision of an adequate number of cycle stands on site. The Main Works Contractor(s) will work with the Local Highway Authorities to ensure cycle parking standards are met.

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		induction is done in advance of workers attending site so they have a full understanding of their travel options alongside more detail on the consequences of staff parking on the roadside or restricted locations.	The Main Works Contractor(s) will be encouraged to share this information as early as practicable for staff working on site. Section 3.2 of the 7.3 Outline Construction Traffic Management Plan [APP-309] provides an overview of the site-specific induction that all staff and operatives working on the Project will receive. Site car parking arrangements are included within the induction topics. Construction worker overspill parking on the public highway has been identified as a matter of non-compliance and would follow the non-Compliance procedure in Section 6.3 of the 7.3 Outline Construction Traffic Management Plan [APP-309].
6.21.10	Essex County Council	<i>Appendix B – Outline Construction Worker Travel Plan (APP-311)</i> An important part of the Travel Plan will be monitoring and reviewing the mode share, car occupancy and parking on site to understand how effective the measures are and whether the assumptions included in the assessment have been realised. The monitoring and review should relate to the specific groups of staff so that it can be related back to the assumptions in the assessment (ie office staff – vehicle occupancy of 1, and construction workers – vehicle occupancy of 2) as well as the targets set.	The Main Works Contractor(s) will develop the final Construction Worker Travel Plan (CWTP). Monitoring the final CWTP will be central to ensuring its aims are delivered in practice. As set out in Section 8 of 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311], the Travel Plan Coordinator will monitor travel throughout the construction phase and will report the findings in the quarterly reports, shared with the Applicant, the Main Works Contractor(s) and the Local Highway Authority. Mode-share information will be collected on a regular basis at site check-in. The modal split and parking accumulation information will be used to monitor travel choices to and from the site. Information showing the modal split of staff will be published in monthly cascades and on-site notice boards.
6.21.11	Essex County Council	<i>Appendix B – Outline Construction Worker Travel Plan (APP-311)</i>	The targets noted in 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline

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		There are two targets specified in the CWTP and no baseline information against which to assess them. They are included at paragraph 5.2.1 as 1) to achieve an average minimum occupancy of six personnel per crew van with no more than one car/van parked on site for every three people and 2) to achieve an average minimum occupancy of 1.3 personnel per car. It would seem more logical to make the first target (which is based on the assumptions in the assessment) as the baseline on the basis that these assumptions relate to previous experience on other projects. The second target would then be the only target for the CWTP of achieving the baseline conditions or a betterment. As currently shown the second target has no explanation as to the assumptions underlying it or how it relates to the first target – if this is to be retained then we would require some justification/understanding as to how it has been derived.	Construction Worker Travel Plan [APP-311] are defined in principle, with the Main Work(s) Contractor developing the final Construction Worker Travel Plan. The target occupancy rate of 1.3 was taken as best practice for the minimum target within the Bramford to Twinstead Development Consent Order Construction Traffic Management Plan [EN020002]. Section 6.4 of the 7.11 Transport Assessment [APP-333] provides an overview of the construction staff occupancy assumptions. Office-based staff have an assumed vehicle occupancy of one as a worst case, as less information about their movement patterns are known. The Overhead Line and Cables and Substation construction workers are assumed to stay in similar hotels, and hence a vehicle occupancy of two has been used, with a level of car sharing assumed. Information was made available from the technical teams that confirmed they would sign in at a main site before travelling to their working location, with this travel being completed in crew vans. It is anticipated that the Main Works Contractor(s) will develop the final Construction Worker Travel Plan to include a baseline, where the baseline targets are reflective of the assessment undertaken.
6.21.13	Essex County Council	<i>Appendix B – Outline Construction Worker Travel Plan (APP-311)</i> Section 5.2.3 includes a commitment from the Main Works Contractor to “encourage the use of a crew vehicle for the overhead line workers travelling from compounds to sites, to reflect the vehicle occupancy of six.” ECC question whether the Main Works Contractor could “require” rather than “encourage” as	It is envisaged that the use of a crew vehicle will become the working practice of the Main Works Contractor(s), as outlined in 7.3 Outline Construction Traffic Management Plan - Appendix B Outline Construction Worker Travel Plan [APP-311]. The targets noted within the Outline Construction Worker Travel Plan are defined in principle, with the Main Work(s) Contractor developing the final plan.

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		part of the contract agreements and so commit to this in the CWTP.	
6.21.14	Essex County Council	<i>Appendix B – Outline Construction Worker Travel Plan (APP-311)</i> A commitment in the PRow Management Plan to confirm the rights over the haul road are retained and that the design of how the PRow will cross over will be agreed with ECC prior to any development commencing, is requested.	The Applicant confirms that where Public Rights of Way (PRowWs) are managed on their existing alignment, or diverted, public access will be maintained throughout construction in accordance with the 7.6 Outline Public Rights of Way Management Plan [APP-329]. However, the 7.6 Outline Public Rights of Way Management Plan [APP-329] also notes that, at locations where PRowWs interact with haul roads or certain construction activities, temporary holding of PRow users, or management of crossings, may be required to ensure safety. Site-specific management measures and any temporary diversions will be developed 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. The final PRow Management Plan will be submitted to, and approved by, the Local Planning Authority.
6.1.14	Thurrock Council	<i>Highways and Transport - Local Policy Context - Thurrock Council Core Strategy Local Plan</i> Clarification should be sought to determine if agreement has been reached with the Council to confirm whether there is a requirement for the development scheme to be reviewed against these emerging transport policy documents.	All relevant transport strategy, policy and guidance were reviewed and agreed by Thurrock Council following their review of the Draft Transport Assessment in February 2025. The Thurrock Local Transport Plan Vision 2050 was reviewed but was not explicitly referenced within the 7.11 Transport Assessment [APP-333] as the vision establishes a broader long-term plan for transport in

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			Thurrock and it is not relatable to the Project due to the temporary nature of the impact. The Emerging Thurrock Transport Strategy 2026-2040 was published in November 2025 and was under consultation until February 2026, post Development Consent Order submission. The Applicant will continue to engage with Thurrock Council to understand any impact to the assessment of the Primary Access Routes related to the goals and major schemes provided within the Emerging Thurrock Transport Strategy 2026-2040.
6.1.16	Thurrock Council	<i>Highways and Transport - Local Policy Context - Thurrock Council Core Strategy Local Plan</i> 1. Data gathering (as detailed in the supporting Transport Assessment (TA) and ES) – Limited surveys/primary data collection has been undertaken on the Thurrock Road network (ES Figure 16.4: one ped count and one traffic count on A128, one junction count at site access 85, four PROW survey sites on pedestrian route). Existing models used in assessment should be validated against primary data. 2. Key Parameters and Assumptions – ES paragraph 16.4.32 reiterates 2023 traffic flows were gathered via Department for Transport (DfT) static traffic counters and used to establish future baseline (start of construction activities from 2027). Re-iterating, absence of primary source data for robust assessment of future baseline traffic flows. 3. Data gathering: ES paragraph 16.5.4 states that, for links where DfT traffic flows were not available, traffic flows were collected by the Project Team in	1. Traffic survey data was collected on Primary Access Routes (PARs) and at junctions along the PARs where no recent survey data was available on the road network impacted by the Project. This included automated traffic count (ATC) surveys on PARs and manual classified count (MCC) surveys at junctions agreed with Thurrock Council. User surveys were undertaken on Public Rights of Way (PROWs) identified through engagement with the Thurrock Council Highways and PROW officer. This included Footpath 91, Footpath 84, Footpath 81, Footpath 11, Footpath 12, Bridleway 63 and Hoford Road (a non-motorised road used by walkers and cyclists). The user surveys were carried out in March 2025 and captured walkers, cyclists and horse riders (WCH) movements on a weekday and one day at the weekend. 2. The estimation of the future baseline flows has followed standard methodology and relevant

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		2023, November 2024 and May 2025. ES Appendix 16.1 - Engagement Undertaken Relevant to Traffic and Transport (Transport Working Group Regional Meeting (Thurrock), September 2023) confirms that 2019 DfT data was used and supplemented by November 2023 traffic count surveys, plus additional traffic surveys were undertaken near to 'several' DfT count sites. Further traffic counts were undertaken in November 2024. While the commentary implies primary traffic data sourcing, the number and location of the additional traffic count data is unclear. 4. Vehicle Routeing: the Council have requested further validation that the Primary Access Routes (PAR) selected to confirm these acceptable in terms of highways design and capacity assessments. 5. Abnormal Indivisible Loads (AIL): Route options are yet to be agreed by the Council and other relevant stakeholders, and further investigations (including structural investigations) are required to validate the selected route, complete impacts assessment and determine appropriate mitigation. 6. Highway Design: A series of highways mitigation designs have been prepared for site access points, crossovers and bellmouths which have been audited via a Stage 1 Road safety Audit. The Council have requested additional information to	guidelines including WebTAG⁸⁵ and IEMA Guidelines: Environmental Assessment of Traffic and Movement⁸⁶. Baseline traffic flows were obtained from traffic counts undertaken in November 2023, June 2024, and November 2024. This data was used to estimate the future baseline for the worst-case peak construction year for each PAR by applying an appropriate growth factor derived from TEMPro NTEM dataset v7.2. For committed developments that were not already considered within the TEMPro growth factor, the anticipated construction/operation flows were included within the future baseline. 3. The Applicant confirms that Department for Transport (DfT) 2023 counts have been used within the 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and within the 7.11 Transport Assessment [APP-333] supplemented by ATC surveys. This represents the most up-to-date information available at the time and DfT 2019 counts were not used. For Thurrock DfT 2023 count data was used for PAR 64 A1013 Stanford Road (east of Orsett Cock roundabout). ATC surveys were undertaken in November 2023 on PAR 63 A128 Brentwood Road and PAR 65 Buckingham Hill Road and in November 2024 on PAR 71 Muckingford Road. ATC survey data obtained from the Lower Thames Project Team for June 2024 was used for PAR 66 Brentwood Road, PAR 67 A1013 Stanford Road

⁸⁵ Department for Transport (2025) *WebTAG*

⁸⁶ Institute of Environmental Management and Assessment (IEMA) (2023) *IEMA Guidelines: Environmental Assessment of Traffic and Movement*

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		address safety and design concerns identified in the audit process. TC have detailed in the audit process concerns with these designs/highways' mitigation measures progressing to detailed design stage. As a result, the Council have not been able to accept these designs in principle at Stage 1 Road Safety Audit stage. 7. Highway Mitigation Design: All and any highway mitigation measures requiring works in the public highway will require detailed design approval. Further design works are considered appropriate (as per point 6) 8. Traffic Management Measures (TM) – TM measures will need to be agreed with TC. To enable review, detailed TM plans and will need to be submitted to TC to provide sufficient detail to that submitted at this preliminary stage.	(west of Orsett Cock roundabout), PAR 68 Heath Road and PAR 70 Linford Road. This approach ensured that the baseline data used within the transport assessments captured post-pandemic traffic patterns. 4. The Applicant's proposed routeing and strategy for access in Thurrock has been informed by regular engagement with the Local Highway Authority, as summarised within the Transport Assessment record of engagement 7.11 Transport Assessment – Appendix B – Consultation on the Scope of the Assessment [APP-335]. The Applicant has conducted a rigorous assessment process to identify the most suitable roads for use as Primary Access Roads for vehicles to use to travel between the Strategic Road Network / Major Road Network, and the works areas. This has included swept path analysis, proposals for highway mitigation works where identified to be necessary, and continued engagement with the Local Highway Authority. The 7.11 Transport Assessment [APP-333] provides the assessment of the junctions along the Primary Access Routes. Where required, mitigation measures have been provided to reduce any severe residual cumulative impacts. 5. Whilst specific routeing of proposed future Abnormal Indivisible Load (AIL) movements is not appropriate to be finalised at this stage, the Applicant has developed a proposed strategy for AIL access. This is detailed within the 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310].

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			This strategy has been developed in consultation with the Local Highway Authority and Constabulary. The formal notification of AIL movements will follow the Electronic Service Delivery for Abnormal Loads (ESDAL) system and be undertaken by the appropriate appointed haulage contractor closer to the proposed date of the specific movement. 6. The Applicant is continuing to engage with the Local Highway Authority to respond to specific queries relating to the Stage 1 Road Safety Audit. The Applicant is concurrently supporting the Local Highway Authority with changes to their team by providing additional details of past engagement, design development and other considerations. Through this process the Applicant welcomes future engagement with Thurrock Council and is proactively seeking to satisfy Thurrock Council's requests to receive acceptance of the Stage 1 Road Safety Audits. 7. The Applicant will continue to welcome engagement with the Local Highway Authority during detailed design of works within the public highway. This will also include the Local Highway Authority's role as the Overseeing Organisation for the associated stages of Road Safety Audit during this stage of design. 8. The Applicant notes this request and shall continue to engage with the Local Highway Authority on these matters. The Applicant is proposing to utilise the Permit Schemes in place and operated by Thurrock, in order to best coordinate the street works. The specific locations, timings and specific traffic management will need to be agreed with the

ID	Stakeholder	Comment	NG response
			relevant highway authorities, as noted in paragraph 5.8.2 of the 7.3 Outline Construction Traffic Management Plan [APP-309] .
6.1.22	Thurrock Council	<i>Highways and Transport - Construction Phase Impacts</i> The Outline CTMP makes limited reference to local bus services. While the assessment identifies moderate to large significant effects in relation to public transport delay on a number of Primary Access Routes during the construction phase, further consideration is required in respect of the implications for local bus services and the adequacy of the mitigation proposed through the CTMP.	7.3 Outline Construction Traffic Management Plan [APP-309] sets out mitigation measures to minimise potential impacts on public bus services. The Applicant will make effort to work with local bus operators, including school bus operators to ensure disruption caused by Abnormal Indivisible Load deliveries is minimised. If a bus stop is located on a road proposed for temporary closure, a temporary stop would be provided, following agreement with the Local Highway Authorities and the bus operations. 7.11 Transport Assessment [APP-333] details that any expected short-term impacts (less than four-week duration) on bus networks will be mitigated on a case-by-case basis, through liaison with bus operators and the Local Highway Authority. The Applicant anticipates this detail will be coordinated by the Main Works Contractor(s) in their development of the final Construction Traffic Management Plan.
6.1.25	Thurrock Council	<i>Highways and Transport - Construction Phase Impacts</i> Document 7.6 Outlined PRow Management Plan shows that 18 PRow are impacted in Thurrock. 11 PRow will be managed on existing alignment; 7 PRow will be temporarily diverted. Hoford Road bridleway mitigation is unclear as a model was used from another area, rather than inspecting or measuring the actual site.	The design and layout of the proposed mitigation proposal along Hoford Road and all diverted Public Rights of Way were developed based on site specific data and information. The design that has been developed in the indicative layouts considered both Design Manual for Roads and Bridges design standards, and the anticipated design vehicles using this route. The design development of Hoford Road utilised high density LiDAR data to verify vertical constraints and

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			their visibility splay requirements, and where identified, the Order Limits have been refined to accommodate potential works to mitigate 3D constraints. This includes allowance for earthworks and drainage.
6.1.47	Thurrock Council	<i>Highways and Transport - Other – Draft Development Consent Order (DCO)</i> The commentary is noted that the Project would ‘likely’ use the proposed and tested SAPs and PARs. This statement implies potential for alteration or changes to the tested SAPs and PARs. Due consideration would need to be given to any such alterations or changes, with appropriate re-testing and mitigation provided as may be necessary to be undertaken by the Applicant and re-submitted for review by the Council and any relevant stakeholders.	The Applicant notes this comment. It is expected that the Main Works Contractor(s) will use the Primary Access Routes and the Site Access Points as proposed. There may be site specific refinements to the Site Access Points as the Main Works Contractor develops the detailed design and topographical survey is obtained. However, any proposed changes that extend beyond the Project Order Limits would need to be formally approved by the affected landowner and Local Highway Authority.
6.1.50	Thurrock Council	<i>Highways and Transport - Other – Draft Development Consent Order (DCO)</i> It is noted that numbers of forecasts of the number of construction vehicles and access arrangements are deemed as being ‘unlikely’ to change. This statement implies potential for change; therefore, due consideration would need to be given to any such changes, with appropriate re-testing and mitigation provided as may be necessary undertaken by the Applicant and re-submitted for review by the Council and any relevant stakeholders.	The Applicant notes this comment. 7.3 Outline Construction Traffic Management Plan [APP-309] details that it is the responsibility of the Main Works Contractor(s) to monitor the number of HGVs travelling from the Strategic Road/Major Road Network to site. There are a number of junctions on the assessed road network, which have not been highlighted as needing formal mitigation throughout the construction period. These junctions are anticipated to be monitored throughout the construction period, and where junctions are performing under current baseline conditions, this will be discussed with the Local Highway Authority when required.
6.1.56	Thurrock Council	<i>Highways and Transport - Required Mitigation</i> External to this ES assessment it is noted that some mitigation measures within the Outline CTMP relating	The Applicant is continuing to engage with the Local Highway Authority to respond to specific queries relating to the Stage 1 Road Safety Audit. The

ID	Stakeholder	Comment	NG response
		to highway modifications for construction vehicles (including AILs), as reviewed, are yet to be agreed by the Council at the preliminary design stage (Stage 1 Road Safety Audit) due to lack of design detail and lack of response to key highways design and safety issues. As such, these highways designs and construction vehicle mitigation measures are yet to be agreed.	Applicant is concurrently supporting the Local Highway Authority with changes to their team by providing additional details of past engagement, design development and other considerations. Through this process the Applicant welcomes future engagement with Thurrock Council and is proactively seeking to satisfy Thurrock Council's requests to receive acceptance of the Stage 1 Road Safety Audits.
6.1.57/6.1.58	Thurrock Council	<i>Highways and Transport - Required Mitigation</i> All mitigation measures proposed within the TA, Outline CTMP, and ES, both physical and best practice, should be agreed by the Council and any other stakeholders ahead of any works commencing. 6.1.58 All mitigation processes as laid down in Document: 7.6 PRow Management Plan is to be adhered to.	Traffic and transport mitigation proposed within 7.11 Transport Assessment [APP-333] and the Environmental Statement Chapter 16 - Traffic and Transport [APP-271] is captured within 7.3 Outline Construction Traffic Management Plan [APP-309]. It is the intention that a final Construction Traffic Management Plan be agreed prior to each stage of authorised development. 7.3 Outline Construction Traffic Management Plan [APP-309] and 7.6 Outline Public Rights of Way Management Plan [APP-329] are secured through Requirement 4(1) of Schedule 3 of the 3.1 Draft Development Consent Order [APP-056].
6.1.66	Thurrock Council	<i>Highways and Transport - Comments on Supporting Documents</i> The Council and the applicant are to reach an agreement in respect of the approach for further assessments, information provided or design development to be undertaken by the applicant and the resultant outputs provided to the Council and any other relevant stakeholders for review for the following: 9. Data gathering	The Applicant has regularly engaged with the Council throughout the development of Development Consent Order (DCO) proposals for the Project. More recently (in February 2026) the Applicant has held detailed discussions with the new representatives acting on behalf of the Council to provide historic context and agreements and develop their understanding relating to key aspects of the Project proposals and DCO. These meeting have covered Primary Access Route route selection, Stage 1 Road Safety Audit, access strategy and design for site access points and crossing

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		10. Assessment of impacts based on forecasting 11. Mitigation based on impacts on forecasting 12. Policy compliance (see points 1, 2 and 3). 13. Pre and Post Construction Surveys 14. TM Measures (including Traffic Regulation Orders (“TRO”) / Temporary Traffic Regulation Orders (“TTRO”)) 15. PARs; 16. AIL Routeing; 17. AIL Structural Investigations; 18. AIL Assessment of Impact; 19. Highways Design (Site Access, Crossover and Bellmouth Designs); 20. Highway Mitigation Design; 21. TM.	points, highway mitigation design, and Traffic Regulation Order strategy. The Applicant has signposted the Council and their representatives to DCO materials, and the Applicant remains committed to additional further dialogue with the Council and their representatives to agree the matters under discussion within the detailed design/ahead of works being commenced.
6.1.66	Thurrock Council	8. AIL Routeing: AIL route options have been determined and are detailed within the Outline CTMP. It is noted that discussions with statutory stakeholders are ongoing on the majority of route options, and in some instances further information is required, therefore routes for the various AIL load routes are yet to be fully assessed and finalised. 9. AIL Structural Investigations: Discussions with statutory stakeholders are ongoing on the majority of route options, and in some instances further information is required. Therefore, routes for the various AIL load routes are yet to be fully assessed and finalised. 10. AIL Assessment of impact: It is noted that the AIL routeing strategy is subject to agreement (see point 8)	8-10: The Contractor will confirm source materials and equipment which will inform the logistics and routeing of the abnormal load deliveries which are required in order to finalise the routes. As noted in 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310] the Contractor will liaise with the relevant stakeholders to assess the routes prior to these movements and obtain the necessary permits. Proposed AIL routes are presented in 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310] with corresponding indicative highway mitigation plans shown in 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Section H [APP-320].

ID	Stakeholder	Comment	NG response
		and change on finalisation of construction programme. A full assessment would need to be undertaken of the impacts of the AIL movements in terms of capacity and potential mitigation requirements to determine the full impacts on the highway.	
16.13.11/16.13.12	Thurrock Council	<i>Waste and Recycling - Construction Phase – Negative Impacts</i> Traffic management, temporary road closures, narrowed carriageways, or parking suspensions may obstruct refuse collection vehicles ("RCVs") and/or access to bin stores, leading to missed/late collections and service reliability impacts. 6.13.12 Increased HGV movements may coincide with collection rounds, increasing safety risks for crews and residents and potentially requiring route changes.	The Applicant proposes to use the Permit Scheme operated by Essex County Council to coordinate the traffic management, road closures and parking suspensions. It is anticipated that refuse collection services will be notified by the Local Highway Authorities and services will be adjusted accordingly. The 7.3 Outline Construction Traffic Management Plan [APP-309] includes the preparation of a driver information pack which will be issued to every construction vehicle driver/everyone working on site. This is expected to include information on locations where pedestrians may be in the highway.
16.13.25	Thurrock Council	<i>Waste and Recycling - Construction Phase – Required Mitigation</i> CTMPs must explicitly consider RCV access (widths/turning, swept paths, stopping points, overhead clearances, safe passing places) and protect access to bin stores/communal collection points.	This comment has been noted by the Applicant. The Applicant has completed the assessment of the Primary Access Routes based on two-way Heavy Goods Vehicles (HGVs). The standard HGV included within the assessment is defined as ‘a motor vehicle with a gross vehicle weight (GVW) of more than 3.5 tonnes, used for transporting goods’. RCV trucks are included within the definition of a HGV, and as such are inherently considered as part of the assessment.
16.14.25	Thurrock Council	<i>Recreation and Leisure - Local Impact Assessment – Required Mitigation</i> The following mitigation is requested:	As set out in the 7.6 Outline Public Rights of Way Management Plan [APP-329], Public Rights of Way (PRoWs) affected during construction will be managed through appropriate phasing, using clear signage, with

ID	Stakeholder	Comment	NG response
		i. PRow, bridleway and active travel mitigation: protect, phase and sign diversions; deliver like-for-like or better surfacing, lighting (where appropriate), accessible gradients and furniture on reinstatement. ii. Open space protection and reinstatement: pre-condition surveys; avoid peak sport seasons; reinstate pitches to Sport England/NGB standards; compensate any temporary loss of usable pitch capacity. iii. Community access: maintain safe, signed access to key leisure assets and riverside spaces; provide construction traffic marshals near schools, parks and leisure sites.	temporary diversions provided where necessary to maintain connectivity. Temporary PRow diversions are expected to be largely unsurfaced, consistent with existing PRow conditions, though localised strengthening with suitable granular material may be applied where required, subject to agreement with the Local Highway Authority. All affected PRows will be reinstated to their original alignment and condition to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys. Open Space – The right to roam across the affected Open Access Land will be maintained. However, access to areas where construction activities are being undertaken will be subject to restrictions on safety grounds that will be managed by the contractor as set out in Table 8.2 Site-specific OAL management proposals of the 7.6 Outline Public Rights of Way Management Plan [APP-329]. Community Access – As set out in 7.2 Outline Code of Construction Practice [APP-300], where community facilities and recreational assets cannot be avoided and fall within the Order Limits, access to these affected assets will be maintained where practicable. In the case of closures, appropriate access arrangements, including temporary diversion will be provided. Advance notice signage will be erected regarding route diversion. These notice boards will be erected prior to and throughout the construction period.

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12.11	Tendring District Council	<i>Integrated Traffic and Highways Management (District-Wide CTMP)</i> 12.11 A single, multi-project Construction Traffic Management Plan for Tendring, requiring: i. Jointly agreed HGV routing ii. Restrictions on peak-time movements iii. Prohibition of simultaneous closures on key links iv. Shared traffic monitoring v. Mitigation triggers (e.g., when HGV volumes exceed thresholds) vi. Coordination with Essex Police, emergency services, parish councils, freight operators and local bus providers	The Applicant has developed 7.3 Outline Construction Traffic Management Plan [APP-309] and has committed to joining and engaging with the Developer's Forum to be set up by Essex County Council [RR-1083]. The Applicant envisages that the routing of construction vehicles, associated traffic management, traffic management and mitigation triggers will be discussed within this forum. Section 5.10 of the 7.3 Outline Construction Traffic Management Plan [APP-309] details that the Applicant and the Main Works Contractor(s) will liaise with the police and blue light services. It is anticipated that the Main Works Contractor(s) will develop an Incident Management Plan in agreement with the blue light services. Highways works will also be managed and coordinated through the Permit Scheme, to minimise the disruption from road closures and diversions. The avoidance of construction traffic during peak hours has not been applied as a general mitigation measure. Several junctions are used by multiple construction access routes, and it would not be practical to coordinate all construction vehicle movements outside peak periods.
12.3	Tendring District Council	<i>Tendring-Specific Cumulative Risks</i> TDC considers the following highways risks to be particular acute and concerning: i. Simultaneous use of narrow rural lanes such as Wick Lane, Little Bromley Road, Ardleigh Road, Crown Lane, Old Ipswich Road and the A137 / A120 feeders.	The Applicant has identified several suitable routes within the Tendring District which are considered to be suitable for use by construction traffic. The Primary Access Routes have been assessed for two-way HGV movements, and any additional mitigation is detailed within the 7.3 Outline Construction Traffic Management Plan - Appendix C - Indicative Highway Mitigation Plans [APP-312 – APP-320].

ID	Stakeholder	Comment	NG response
		ii. Multiple haul roads and access tracks being established independently by different promoters, leading to duplicated land take, repeated landscape loss and potential highway safety issues if not properly co-ordinated. iii. HGV movements overlapping during morning and evening peak times, causing danger, severance and long-term loss of rural quietness, as evidenced by Tendring's LPA landscape assessments. iv. Inadequate safeguards to prevent conflicting and un-coordinated road closures or diversions, risking disruption to: – Bus routes – School travel – Agricultural seasonal operations – Emergency response access	Some routes will be subject to short-term temporary closure, primarily associated with bellmouth construction or overhead line netting and stringing activities. Where diversions are necessary (due to temporary closure of roads), they will adopt the principle that they will use the same standard of road, or higher where practicable and available. Diversion routes within the Tendring District are identified in Section C, Plans D and E on 2.5 Access, Rights of Way and Public Rights of Navigation Plans – Section C [APP-035]. The A137 is not a feeder to the Primary Access Routes in Tendring. The A120 forms part of the Strategic Road Network that provides access to the Primary Access Roads. 7.11 Transport Assessment [APP-333] has assessed the forecast percentage increases of traffic flows on the A120, resulting in maximum increases of less than 10% which is deemed to be non-significant on a non-sensitive road. The Applicant has and will continue to engage with the promoters of North Falls and Five Estuaries Wind Farms on the design matters and proposed use of haul roads. The Applicant's proposal for a permanent access route, is to facilitate operational Abnormal Indivisible Load movements to the East Anglia Connection Node (EACN) and will be required as part of the Project. The Applicant is proposing to use the Permit Scheme managed and run by Essex County Council, to help coordinate the traffic management requirements. The Applicant has committed to joining and engaging in the Developers Forum proposed by Essex County Council, to coordinate the approach to traffic management.

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12.5	Tendring District Council	<i>Community Disruption</i> Protected and/or Characterful Lanes (such as Wick Lane, Little Bromley Road, Ardleigh Rod, Bentley Road) face traffic safety risks and permanent degradation of their rural character.	The 7.3 Outline Construction Traffic Management Plan [APP-309] sets out details for pre- and post-work condition surveys, and additionally details traffic management requirements to be considered to minimise traffic safety risks. The preliminary designs have been developed in accordance with the Design Manual for Roads and Bridges standards and relevant guidance, and subject to Stage 1 Road Safety Audits. The Applicant has engaged with the Local Highway Authority throughout the development of these proposals. The 7.4 Outline Landscape and Ecology Management Plan [Revision C] sets out the principal measure that are required to minimise, mitigate and compensate for the potential ecological and landscape and visual effects of the Project during and post construction, secured by Requirement 9 in the 3.1 Draft Development Consent Order [APP-056].
14.16	Tendring District Council	<i>Requested TDC specific Commitments and Securing Mechanisms</i> i. Construction Traffic/Noise Controls for Bentley Road and Adjacent Lanes ii. Capped daily HGV flows, time-of-day restrictions, no evening/night HGVs, and iii. advance works black-outs during sensitive periods (e.g., school runs).	The Applicant has stated within 7.3 Outline Construction Traffic Management Plan [APP-309], paragraph 5.4.17, '<i>Given ... the comprehensive trip generation and distribution approach and the proposed mitigation measures, a cap on vehicle numbers is not considered necessary</i>'. The Applicant has also committed to monitoring and managing the Project's impact on the road network, as 7.3 Outline Construction Traffic Management Plan [APP-309] additionally states that the Main Works Contractor(s) will also be expected to monitor the number of construction vehicles using the Primary Access Routes between the sites and the Strategic Road/Major Road network.

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			The Applicant has undertaken a Transport Assessment (7.11 Transport Assessment [APP-333]). The assessment of Bentley Road and Ardleigh Road has not identified a requirement to restrict construction traffic movements, particularly during peak hours or school drop off and pick up times.
14.18	Tendring District Council	<i>Requested TDC specific Commitments and Securing Mechanisms</i> 14.18 PRoW, NMU and Safe Movement Package i. Mapped, fully segregated NMU routes where HGVs intersect with everyday pedestrian/horse-rider movements; short, signed diversions with quality surfaces/lighting where appropriate, and continuity of rural leisure routes. ii. Micro-grants for community route guardianship, wayfinding, and rural wellbeing walks during construction phases.	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 the 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 PRoW would be closed without a diversion in place and no severance of the overall network is anticipated. Impacts, management proposals and indicative durations for each affected PRoW are contained in the 7.6 Outline PRoW Management Plan [APP-329]; the proposals are mapped out in the 2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-033 to APP-040] and both 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

ID	Stakeholder	Comment	NG response
			final PRow Management Plan will be submitted to, and approved by, the Local 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 the 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. The Applicant has also developed an 7.3 Outline Construction Traffic Management Plan [APP-309] whose purpose is to monitor, mitigate and manage the impacts around construction traffic. Section 5.9 of that document details the illustrative mitigation measures on Primary Access Routes across the Project. The Applicant considers that Tendring District Council's request for micro-grants falls outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the DCO. The Applicant suggests that this matter be discussed outside of the development consent process and with reference to the Community Funds for Transmission Infrastructure guidance⁸⁷.

⁸⁷ <https://www.gov.uk/government/publications/electricity-transmission-network-infrastructure-community-funds/community-funds-for-transmission-infrastructure-accessible-webpage>

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19.3	Tendring District Council	<i>Traffic and Transport</i> In terms of unknowns and insufficiency of mitigation, while an Outline CTMP/PRoW Plan is referenced, key operational controls remain undefined at this stage, for example: i. finalised routing and phasing at link-level, ii. binding caps on ‘in-combination’ daily movements across PAR30/PAR31/PAR33 (accounting for all NSIPs/schemes), iii. committed, pre-construction physical upgrades (carriageway widening/edge strengthening, drainage and culverts, walking/horse-rider protection), and iv. enforceable residential-amenity protections (quiet hours, night-time AIL strategy, continuous access management for frontagers).	i. The 7.3 Outline Construction Traffic Management Plan [APP-309] includes details on the construction routeing strategy. Section 5.4 sets out that construction HGV movements are limited to Primary Access Routes. HGV drivers not adhering to the agreed routes is identified as an act of non-compliance within Section 6.3. The Primary Access Routes are displayed in 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans [APP-312 – APP-320]. ii. The Applicant has undertaken a robust trip generation and assessment exercise for both the Overhead Lines and Cables and Substation construction activities. This has been calculated as a worst-case assessment, to be transparent in the expected trips along each construction route. The Applicant has stated within 7.3 Outline Construction Traffic Management Plan [APP-309], paragraph 5.4.17, ‘Given ... the comprehensive trip generation and distribution approach and the proposed mitigation measures, a cap on vehicle numbers is not considered necessary’. The Applicant has also committed to monitoring and managing the Project’s impact on the road network, as stated in the 7.3 Outline Construction Traffic Management Plan [APP-309], paragraph 6.2.6: ‘The Main Works Contractor(s) will also be expected to monitor the number of construction vehicles using the Primary Access Routes between the sites and the Strategic Road/Major Road network’.

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			iii. 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans [APP-312 – APP-320] provides detail of the proposed mitigation works. It is anticipated that the Main Works Contractor(s) will provide physical upgrades where appropriate pre-construction. 7.3 Outline Construction Traffic Management Plan [APP-309] details the Applicant’s proposals for reducing disruption from construction activities to existing users on the public highway network and properties adjacent to it. There are various measures contained within this to protect residential amenity, for instance, the maintenance of existing access to and from residential, commercial, community and agricultural land uses throughout the construction phase, or as agreed through landowner discussions.
19.4	Tendring District Council	<i>Traffic and Transport</i> The ES itself acknowledges assumptions, data limitations and reliance on professional judgement; it also takes a road-only logistics scenario for the main assessment—leaving some uncertainty around actual HGV volumes through Tendring’s rural network during the busiest phases. Even on the Applicant’s figures, IEMA “Rule 1/Rule 2” thresholds are greatly exceeded on PAR30 and adjacent links, and cumulative peaks will be experienced on roads with residential frontages (contrary to policy aims to avoid severe residual cumulative impacts).	Whilst the main assessment scenario described is the road-only strategy, a review of more sustainable modes of transport to deliver materials to the Project has also been undertaken. This assessment is considered as a sensitivity test in 7.11 Transport Assessment [APP-333]. As part of sensitivity testing, the multi-modal route options have been analysed to determine the potential construction traffic distribution, particularly HGV movements, and assess the capacity of affected road networks to accommodate these changes. The analysis focuses on the Strategic Road Network, Major Road Network, and local roads that access the multi-modal ports / sidings impacted by the construction logistics. In 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271], the committed

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			developments combined with the Project flows contribute to the cumulative assessment for daily traffic increases against future baseline. Where required, mitigation measures have been provided and considered when assessing the cumulative impacts arising from both the Project and all other committed developments to avoid severe residual cumulative impacts. For PAR 30 Bentley Road, the Applicant is proposing to undertake highway mitigation works and implement traffic mitigation measures relating to the proposed access via Bentley Road, incorporating: i. Permanent widening of the carriageway on Bentley Road to facilitate the proposed construction traffic movements, including improvements made to the A120/Bentley Road junction ii. Temporary provision of a segregated facility for Non-Motorised Users remote from the carriageway during construction of the Project iii. Temporary speed limits on Bentley Road and temporary and permanent speed limits on Ardleigh Road. A driver information pack for all staff and operatives working on the Project will provide information on nearby pedestrian crossings and locations where pedestrians or equestrians may be in the highway, alongside the appropriate actions to take. Taking into consideration the proposed mitigation on PAR 30 the residual construction significance of effects would be slight adverse, would be temporary, and not significant.

ID	Stakeholder	Comment	NG response
19.5	Tendring District Council	Having regard to the ES evidence on PAR30 and surrounding A/B-routes, the ECC single response, TDC's RR and SoCG, and TDC's oral evidence, the Council considers that residual cumulative traffic and transport impacts in Tendring are severe to extremely severe, particularly residential amenity harm (noise, vibration, access), network operation (delay, safety at constrained junctions and frontages), and vulnerability of non-motorised users. Proposed mitigation is neither sufficiently defined nor capable of reducing effects to an acceptable level on this rural network. Prevention remains the only reliable mitigation: the EACN should not be sited here, given the scale of 'in-combination' vehicular movements required and the evident constraints of Tendring's lanes and settlements. Regardless of any EACN relocation proposals, no DCO should be granted without legally-secured, route-specific movement caps (including all NSIPs), front-loaded physical highway upgrades delivered before peak flows, and enforceable residential-amenity protections—but even with such measures, significant adverse local effects would remain in Tendring.	The Applicant notes the concerns raised by Tendring District Council. On the basis of the assessments undertaken and mitigation measures proposed within the Development Consent Order application, the Applicant does not consider that the residual Traffic and Transport impacts arising from the Project will be excessively severe. The Applicant notes that the comment from Tendring District Council relates to Bentley Road, indicated as Primary Access Route (PAR) H17-A2 in 7.3 Outline Construction Traffic Management Plan - Appendix C – Indicative Highway Mitigation Plans – Section C [APP-315] Sheets 14 and 15. Assessment with respect to noise and vibration arising from construction traffic is set out in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]. This assessment identified potential impacts relating to 16 properties in the vicinity of Bentley Road, and potentially more significant relating to one specific property (identified as Jasmine Cottage) due to its proximity to the existing carriageway. The effects at other properties on Bentley Road are not considered to be significant. It is anticipated that measures set out in 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306] will be put in place by the Main Works Contractor to monitor and manage noise impacts relating to construction traffic in this area. Further to this, the Applicant is proposing to undertake mitigation works relating to the proposed access via Bentley Road, incorporating:

ID	Stakeholder	Comment	NG response
			i. Permanent widening of the carriageway on Bentley Road to facilitate the proposed construction traffic movements, including improvements made to the A120/Bentley Road junction. A permanent speed reduction is also proposed ii. Temporary provision of a segregated facility for Non-Motorised Users (NMUs) remote from the carriageway during construction of the Project. These proposals are discussed within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130], with an indicative layout further shown in 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]. This proposed mitigation design has been subject to the Road Safety Audit process set out in 7.11 Transport Assessment - Appendix A – Norwich to Tilbury RSA Strategy [APP-334], with Essex County Council as the Overseeing Organisation for the works relating to the Local Road Network, and National Highways as the Overseeing Organisation specifically for the proposals relating to the A120/Bentley Road junction as part of the Strategic Road Network. The Road Safety Audit for Bentley Road considered both the proposed carriageway widening and NMU provision. As such, the outline design proposed is considered to be suitable for the current stage of design. Further detailed design will be undertaken by the Main Works Contractor, and the Applicant will continue to engage with the relevant highway authorities throughout this process.

ID	Stakeholder	Comment	NG response
			With respect to the comment by Tendring District Council on highway network operation, assessment of highway network capacity has been undertaken, and is set out in 7.11 Transport Assessment [APP-333]. This includes modelling for the junction of Bentley Road with the A120 Harwich Road – referenced as Site 39 within the Transport Assessment – which concluded that this junction would be expected to operate within capacity, considering future baseline traffic usage and Committed Developments (which are listed within 7.11 Transport Assessment - Appendix D - Committed Developments [APP-337]) in addition to the construction traffic anticipated for the Applicant’s proposals. Hence, the proposed usage is considered to be appropriate.
17.2.1	Braintree District Council	<i>Highways and Transportation</i> During the construction phase, the development is anticipated to give rise to considerable impacts on the local and strategic highway network. Any new or altered access points, whether temporary or permanent, must be demonstrably safe and appropriate for their intended use. In this regard, the Council fully supports the position of Essex County Council, as the Highway Authority, and considers its comments on highways and transportation impacts to be afforded significant weight.	The preliminary designs of accesses, as presented in 2.6.3 Design and Layout Plans – Traffic and Transport [APP-043] Illustrative Access Bellmouth and Illustrative Crossover Bellmouth, have been developed in accordance with the Design Manual for Roads and Bridges Standards and relevant guidance, and subject to Stage 1 Road Safety Audits. The Applicant has engaged with the Local Highway Authority throughout the development of these proposals. Section 5.5 of 7.3 Outline Construction Traffic Management Plan [APP-309] provides detail on the proposed Site Access Points and Crossover Points, and further detail of traffic management within Section 5.8.

ID	Stakeholder	Comment	NG response
17.2.2	Braintree District Council:	<i>Highways and Transportation</i> In addition, road closures continue to present a significant challenge across the District, particularly in its more rural areas where alternative routes are limited and communities rely heavily on a small number of key roads. The impact of these closures can be substantial, placing pressure on the local road network, increasing journey times, and creating difficulties for residents, local businesses, and essential services. The Council's recent experience with B2T has further highlighted how sensitive rural communities are to disruption and underlines the importance of careful planning, communication, and coordination when road closures are necessary.	Section 5.8.8 of 7.3 Outline Construction Traffic Management Plan [APP-309] provides detail on the proposed road closures and the selection of diversion routes. In instances of road closures on narrow or single-track roads, specific locations, timings and traffic management measures will be agreed with the relevant Local Highway Authority. The proposed duration of these diversion routes is short term, between four and six weeks. Where the closures and diversions are associated with Overhead Line Stringing activities, these are expected to be less than 12 hours and likely to occur overnight. Proposed diversion routes are presented in 2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-033 – APP-040]. Where diversion routes are proposed, they will adopt the principle that they will use the same standard or road or higher, where practicable and available. The Applicant proposes to use the Permit Schemes operated by the Local Highway Authorities to coordinate street works proposed by the Project. Detail of the proposed use of Permit Schemes is set out in Section 2.4 of 7.3 Outline Construction Traffic Management Plan [APP-309]. As the Main Works Contractor(s) develop the final construction programme and associated schedules, the street works will be programmed in a coordinated manner to minimise disruption and confusion to road users. Local residents and businesses who may be affected by the works would be informed by the Community Liaison Officer through letter drops and emails, alongside any advance notices and signages used to communicate the works to road users. These

ID	Stakeholder	Comment	NG response
			notifications are anticipated to include the works, scale of impact, dates and hours of the works. Information on the role of the Community Liaison Offer is provided in Section 6.5 of 7.3 Outline Construction Traffic Management Plan [APP-309].
6.7	Brentwood Borough Council	<i>Assessment of Local Impacts – Impact on Havering's Grove – Consideration and adequacy of DCO</i> Furthermore, there are a number of receptors in very close proximity to the proposal and indeed enclosed between the Order Limits and access routes – including the Woodland Schools (Hutton Manor & Little Acorn), the Oakleigh Farm Horse Livery Stables, and the Swimming Nature-Hutton Manor swim school – that will be negatively impacted over a prolonged period by the works to both underground the existing 132kV line and construct the new 400kV line. These receptors will all be affected by the disruption caused by construction and construction traffic – including air quality, noise, and health and wellbeing – as well as by any necessary road closures and/or diversions, as indicated by Traffic Regulation Orders TR-G-010 and TR-G-011 (road closure) as noted in the maps below.	Impacts on receptors in the vicinity of Project proposals are set out in the Environmental Statement, and in particular 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256]. This does not identify any significant impacts upon any of the receptors suggested by Brentwood Borough Council in the text. It is further noted that none of these receptors is located on the section of A129 Rayleigh Road proposed for use by construction traffic as PAR H33-A1, as shown in 7.3 Outline Construction Traffic Management Plan Appendix C – Indicative Highway Mitigation Plans – Section G [APP-319]. Procedures with respect to road closures are set out in 7.3 Outline Construction Traffic Management Plan [APP-309], and this document further notes that short term closures, such as would be associated with the works proposed in the vicinity of the A129 near Havering's Grove, would be expected to be in place for no more than four weeks, and in this case a diversion route would be provided. The proposed diversion route associated with the road closure between TR-G-010 and TR-G-011 is described in 3.1 Draft Development Consent Order [APP-056] Schedule 8, and shown in 2.5 Access, Rights of Way and Public Rights of Navigation Plans – Section G [APP-039]. All sensitive receptors within 150 m of the Primary Access Routes (PARs), which included schools in

ID	Stakeholder	Comment	NG response
			Brentwood, were considered within 6.16 Environmental Assessment Chapter 16 - Traffic and Transport [APP-271] where they are directly located adjacent to the PARs. The Woodland School Hutton Manor, Little Acorns Day Nursery and Swimming Nature-Hutton Manor swim school are not located adjacent to a PAR. However, to the west of the school the A129 Rayleigh Road does form part of PAR 59, where a footway is provided on one or both sides of the carriageway, separated by a grassed verge. The Oakleigh Farm Horse Livery Stables is located to the east of the Woodland School Hutton Manor, Little Acorns Day Nursery and Swimming Nature-Hutton Manor swim school and would be impacted by the Project. There would be temporary acquisition of land from half of the equestrian paddocks during construction for pylon construction, overhead line construction, construction access and to enable temporary third-party works (i.e. UK Power Networks dismantle and cabling works). Access to the northern section of the business would be managed via discussion with landowners prior and during construction. However, there would be temporary access disruption and restrictions to the equestrian fields located within the Order Limits. Within the 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] the assessment of pedestrian, cyclists and horse riding severance, amenity and fear and intimidation found the residual construction effect would be temporary, and not significant when taking account of the mitigation measures/commitments set out in the 7.2 Outline Code of Construction Practice [Revision B] and 7.3

ID	Stakeholder	Comment	NG response
			Outline Construction Traffic Management Plan [APP-309]. This includes commitment GG30 where members of the community, local businesses and local stakeholders will be kept informed regularly of the works through active community liaison. This will typically include the notification of ‘noisy activities’. A driver information pack for all staff and operatives working on the Project will provide information on nearby pedestrian crossings and locations where pedestrians or equestrians may be in the highway, alongside the appropriate actions to take.
6.82	Brentwood Borough Council:	<i>Traffic and Transport – Consideration and adequacy of DCO</i> In addition to the above, the Order Limits as set out in the ES indicate that local roads in the borough, including Little Hyde Lane, Stock Lane, Padham’s Green Road / Mountnessing Road, Old Church Lane and Dunton Road (within Brentwood), all have the potential to suffer negative impacts arising from construction traffic on routes entirely unsuitable for it.	7.3 Outline Construction Traffic Management Plan [APP-309] details the routeing strategy for construction vehicles. The Applicant has identified Primary Access Routes (PARs) for each section of haul road, with additional PARs proposed for longer sections of continuous haul road, where appropriate roads for designation as a PAR have been identified. Where assessment has identified geometric constraints along the PARs, highway mitigation works have been proposed. Stock Lane is not proposed to be used as a PAR for construction traffic. The Development Consent Order (DCO) requirement is therefore related to a permanent access route to the proposed pylons during operation. Any need for access would therefore be occasional operational inspection and maintenance requirements only. Proposed permanent access routes are indicated on 6.4.F2 Environmental Statement Figure 4.2 – Proposed Project Design – Permanent Features [APP-134].

ID	Stakeholder	Comment	NG response
			Little Hyde Lane is not proposed to be used as a Primary Access Route for construction traffic. The DCO requirement is therefore related to a permanent access route to the proposed pylons during operation. Any need for access would therefore be occasional operational inspection and maintenance requirements only. Proposed permanent access routes are indicated on 6.4.F2 Environmental Statement Figure 4.2 – Proposed Project Design – Permanent Features [APP-134]. Padhams Green Road / Mountnessing Road and Old Church Lane are proposed as a crane route only, with any mitigation required detailed within 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans – Section G [APP-319]. They will not be used by any construction traffic other than the crane. Schedule 3 of the DCO details that sections of the route may also be subject to a temporary closure, primarily associated with the constriction of the crossover bellmouth. A short section of Dunton Road, from the A127 to the Site Access Point TB-B132 is proposed as a PAR. Mitigation measures are proposed at the junction of Dunton Road and Brentwood Road to accommodate vehicle movements, as detailed within 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans – Section G [APP-319].
6.83	Brentwood Borough Council	<i>Traffic and Transport – Consideration and adequacy of DCO</i> Evidence submitted by residents along the A129 reflects that existing conditions already result in	7.3 Outline Construction Traffic Management Plan [APP-209] details that signage for diversion routes is proposed, and will be installed in accordance with relevant signage design guidance. The Main Works

ID	Stakeholder	Comment	NG response
		periodic congestion and unsafe vehicle behaviour, particularly where narrow rural lanes are used informally as diversion routes during blockages. On several occasions, traffic has become completely gridlocked, with drivers attempting to bypass queues via singletrack lanes, creating near misses, excessive horn use, agitation and unsafe conditions for pedestrians, including children with additional needs. BBC considers that construction related HGV movements, temporary traffic controls and haul road interactions in this area risk compounding these existing pressures, leading to unacceptable localised severance and safety impacts if not robustly managed.	Contractor(s) will undertake regular maintenance checks to report and rectify any defects with signage. Construction HGVs are limited to use the Primary Access Routes, with the exceptions noted within 7.3 Outline Construction Traffic Management Plan [APP-309]. Section 6.4 states that HGV drivers not adhering to the agreed routes is defined as a non-compliance. On receipt of a report of potential non-compliance, the procedure noted in Section 6.3 would be followed. Traffic Management is anticipated to be coordinated through the Local Highway Authorities Permit Schemes and will be agreed prior to installation. Crossing points (haul road intersections) will be designed to reduce highway safety risks, with construction traffic giving way to users of the public highway. Temporary speed limit restrictions are also proposed in the vicinity of crossing points. Link PARs 58 and 59 (capturing the one-way system) indicate that the Project is proposing 15 (58 and 59) and 7 (58 one-way system, 59 one way system) HGV movements in the AM and PM peak periods; that is one HGV every 4 minutes or every 8 minutes in the one-way system. This equates to a total traffic increase of less than 1% for a peak duration of 7 weeks. Details can be found within 7.11 Transport Assessment - Appendix E LRN AM and PM Peak Construction Traffic and Committed Development Impacts [APP-338]. Five junctions along the A129 have been modelled within 7.11 Transport Assessment [APP-333]; the results of these are detailed below: i. A176/A129 Southend Road (Site 78)

ID	Stakeholder	Comment	NG response
			ii. A129 Southend Road/A129 Sun Street (Site 79) iii. A129 Sun Street/ A176 Laindon Road (Site 80) iv. A129 London Road/ Western Road (Site 81) v. A129 London Road/Mountnessing Road (Site 82). Sites 78 and 80 were not identified as a need for junction modelling. The results from the modelling indicate that for Site 79 the addition of construction traffic does not cause capacity to be exceeded. Therefore, no mitigation has been proposed. Site 81 indicated a slight decrease in the available capacity with the construction traffic, and a proposal of signal time optimisation would reduce the effects. The junction modelling results for Site 82 indicate a delay in the road users turning onto Mountnessing Road, due to the decrease in available space to turn from the A129 with the addition of construction traffic. The Applicant is proposing to monitor the performance of this junction during construction and will discuss any additional mitigation with the Local Highway Authority, where appropriate. Table A16.4.8 Summary of impact assessment in 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] provides a summary of the impact assessment for PARs 58 and 59. The findings of the assessment that considered sensitive receptors and the road environment, identified that there would be slight adverse effects on pedestrian, cyclist and horse-rider severance, amenity and fear and intimidation. The findings of the assessment of effects would be temporary and are considered not significant when

ID	Stakeholder	Comment	NG response
			taking into consideration mitigation detailed within 7.3 Outline Construction Traffic Management Plan [APP-309]. This includes a driver information pack for all staff and operatives working on the Project which will provide information on nearby pedestrian crossings and locations where pedestrians or equestrians may be in the highway, alongside the appropriate actions to take. These measures will help ensure the safety of all road users on the A129 during the construction of the Project.
6.85	Brentwood Borough Council	<i>Traffic and Transport – Consideration and adequacy of DCO</i> BBC recognises that ECC is the lead on technical matters relating to PRoW's, but again wishes to stress the importance of these routes both to its local communities and to the wider visitor economy. The proposed OHL and associated construction works will cause significant severance and disruption to key routes, identified in the ES as Ingatestone and Fryerning (23 & 45) (temporary closure and diversion, and managed temporary closure respectively), Mountnessing (7) (managed temporary closure), Brentwood (90, 96 & 98) (managed temporary closure, managed temporary closure and temporary diversion, and managed temporary closure respectively), West Horndon (62) (managed temporary closure and managed diversion) and West Horndon (68) (managed temporary closure and temporary diversion).	The overall strategy, as set out in the 7.6 Outline Public Rights of Way Management Plan [APP-329], is to maintain access along Public Rights of Way (PRoWs) at all times throughout the construction period, either through managed access along the PRoW on its existing alignment, or through provision of appropriate diversions. As such there are no PRoWs within Essex that would be subject to closure without diversion and there would be no severance of the overall network as a result of the Project's construction. The same document also confirms the intention to reinstate any affected PRoW to its original line and condition following completion of construction and to remove any temporary mitigation, notwithstanding that there may be the opportunity to retain some temporary mitigation permanently, subject to approval by the relevant Local Highway Authority and landowners. Notwithstanding the above, the maximum delay for pedestrians associated with the temporary diversions on the PRoW referenced in the comment would be

ID	Stakeholder	Comment	NG response
			approximately one additional minute and therefore no significant impact would be expected.
6.87	Brentwood Borough Council:	<i>Traffic and Transport – Consideration and adequacy of DCO</i> Considering the points above and in order to address ongoing concerns, BBC continues to support ECC's position that it will be necessary to secure enforceable commitments for a robust Construction Traffic Management Plan (CTMP), including clear routing strategies, restrictions on HGV movements during peak periods, and a programme of road condition surveys with agreed intervention levels. In addition to this, BCC would request full representation on any Traffic Management Forums or equivalent that would be established to ensure the CTMP is properly executed and meets its commitments.	The Main Works Contractor will develop Final Construction Traffic Management Plans (CTMPs) for each work areas with the intention that a detail CTMP is to be agreed prior to the commencement of each stage of authorised development. All delivery contractors and construction staff will be instructed to use the agreed construction access routes, complying with the agreed final CTMP for each work area. An 'identifier' would be placed within the window of all delivery vehicles to enable residents to identify construction HGVs associated with the Project. Section 6.4 of 7.3 Outline Construction Traffic Management Plan [APP-309] states that HGV drivers not adhering to the agreed routes is defined as a non-compliance. On receipt of a report of potential non-compliance, the procedure noted in Section 6.3 would be followed. Table 5.9 in 7.3 Outline Construction Traffic Management Plan [APP-309] details the proposed junction capacity mitigation measures, where peak hour restrictions are proposed for certain junctions. Junctions will be monitored and instances where the junction is performing under current baseline conditions will be discussed when required. The Applicant notes the comment on joining a Traffic Management Forum, and the data recorded from the non-compliance procedure will be collated on a quarterly basis and issued to the relevant parties.

4.15 Cumulative Effects

Introduction

- 4.15.1 The cumulative effects assessment (**6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]**) considered two types of cumulative effects; ‘intra-project’ and ‘inter-project’ cumulative effects. The cumulative effects assessment was undertaken in accordance with the **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]**, by competent experts and in accordance with the Planning Inspectorate’s Advice Note - Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment (Planning Inspectorate, 2024).
- 4.15.2 The long list of ‘other existing and / or proposed developments’ was submitted to all Local Planning Authorities in May 2025 to agree / confirm the list of cumulative developments to include within the inter-project cumulative effects assessment. Responses were received from Babergh and Mid Suffolk District Council and Colchester City Council and all developments suggested for inclusion that met the criteria within the inter-project cumulative effects methodology were included. Responses were not received from Brentwood Borough Council, Basildon Borough Council, Braintree District Council, Chelmsford County Council, South Norfolk District Council, Tendring District Council, Thurrock Council, Essex County Council, Norfolk County Council and Suffolk County Council.
- 4.15.3 Regular coordination meetings have also been held with other developers including those promoting the North Falls and Five Estuaries wind farm projects and the Lower Thames Crossing. Project teams have worked collaboratively to reduce potential cumulative effects should they be undertaken in parallel.
- 4.15.4 As identified within the submitted Local Impact Reports, the key areas of disagreement remain around the conclusions of the cumulative effects assessment, need for additional mitigation measures and additional developments to be considered within the cumulative effects assessment. These matters have been responded to through the SoCG process and we will continue to engage with the host authorities to reach further areas of agreement where possible.

Local Authority Positions

- 4.15.5 Nine Local Impact Reports raised this topic in the following sections of the Local Impact Reports:

Table 4.27 Cumulative effects - Local Impact Report coverage

Local Authority	LIR Sections covering this topic
Norfolk County Council	N/A
Suffolk County Council. Babergh District Council and Mid Suffolk District Council	Sections 10, 12, 13 and 17 (see the table below for detailed responses to paragraphs 10.3, 10.66, 10.73, 10.74, 12.170, 13.155, 13.157, 17.3, 17.47, 17.54, 17.56, 17.57, 17.81)
Essex County Council	Sections 2 and 4.4

Local Authority	LIR Sections covering this topic
	(see the table below for detailed responses to paragraphs 2.5.11, 4.4.10, 4.4.11, 4.4.26, 4.4.58, 4.4.60, 4.4.63- 4.4.65, 4.4.71, 4.4.75 – 4.4.78)
Thurrock Council	Section 6 (see the table below for detailed responses to paragraphs 6.2.22, 6.7.22, 6.8.6, 6.8.7, 6.8.43 – 6.8.45, 6.11.20)
South Norfolk District Council:	Sections 3, 5, 7, 8.5 and 12 (see the table below for detailed responses to paragraphs 3.1.7, 5.2.1, 5.2.2, 5.3.2, 7.3.2, 8.5.1, 12.4.1)
Tendring District Council	Sections 8, 10 and 12 (see the table below for detailed responses to paragraphs 8.25, 10.2, 10.7- 10.20, 10.23- 10.28, 12.2)
Colchester City Council	Sections 9, 12, 14 and 16 (see the table below for detailed responses to paragraphs 9.23, 9.35, 9.39, 12.145, 14.30, 16.9, 16.10)
Braintree District Council	Sections 15 and 18 (see the table below for detailed responses to paragraphs 15.3.2 – 15.3.4, 15.4.6, 18.2.37, 18.2.38)
Chelmsford City Council	Sections 8 and 11 (see the table below for detailed responses to paragraphs 8.545, 8.548, 8.550 – 8.553, 11.51, 11.52)
Brentwood Borough Council	Section 8 (see the table below for detailed responses to paragraphs 8.2 – 8.7)

- 4.15.6 The Applicant has engaged extensively with Local Authorities on matters relating to Cumulative Effects. This is reported in detail in Statements of Common Ground (SoCGs) (see Table 1.1 for Examination Library references). Within the SoCGs, matters are categorised as Agreed, Not Agreed or Under Discussion.
- 4.15.7 Each SoCG includes a table listing each environmental topic chapter in the Environmental Statement. Under each environmental topic chapter subheading, are a list of seven categories which are aligned with how the Environmental Impact Assessment was undertaken.
- 4.15.8 The bullet points below (split by category) provide a summary of where agreements are currently up to with the host Local Authorities relating to Cumulative Effects (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG).

- Matters relating to EIA – Regulatory, Planning Policy Context and Guidance are under discussion with 6/12 Local Authorities.
- Matters relating to EIA – Approach and Methods are agreed with 8/12 Local Authorities
- Matters relating to EIA – Baseline Conditions are under discussion with 9/12 Local Authorities
- Matters relating to EIA – Embedded, Standard and Additional Mitigation Measures are under discussion with 11/12 Local Authorities.
- Matters relating to EIA – Assessment Conclusions are under discussion with 11/12 Local Authorities
- Matters relating to Draft DCO / Outline Management Plans / Mitigation and Monitoring are under discussion with 12/12 Local Authorities
- Only 3/12 authorities have items relating to Other Matters in the Cumulative Effects section of their Statement of Common Ground. These matters are under discussion with 3/3 Local Authorities.

4.15.9 The following key points not agreed, and will be subject to ongoing engagement:

- Approach to embedded, standard and additional mitigation (Tendring District Council – Not Agreed)

4.15.10 The table below reflects the category (agreed, under discussion, not agreed), most frequently recorded across the SoCGs for each of the 13 Local Authorities relating to cumulative effects (noting that Babergh and Mid Suffolk District Councils share planning functions and therefore have a single SoCG).

Image 4.11 Cumulative effects - categorisation of matters in Statements of Common Ground

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Condition	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring
Norfolk County Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion
Suffolk County Council	Agreed	Agreed	Agreed	Under discussion	Under discussion	Under discussion
Essex County Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion
Thurrock Council	Agreed	Agreed	Agreed	Under discussion	Under discussion	Under discussion
South Norfolk Council	Agreed	Agreed	Agreed	Under discussion	Under discussion	Under discussion
Babergh and Mid Suffolk Councils	Under discussion	Agreed	Under discussion	Under discussion	Under discussion	Under discussion
Tendring District Council	Agreed	Agreed	Under discussion	Not Agreed	Agreed	Under discussion
Colchester City Council	Agreed	Agreed	Under discussion	Under discussion	Under discussion	Under discussion
Braintree District Council	Agreed	Agreed	Under discussion	Under discussion	Under discussion	Under discussion

Local Authority	EIA – Regulatory, Planning Policy Context and Guidance	EIA – Approach and Methods	EIA – Baseline Condition	EIA – Embedded, Standard and Additional Mitigation Measures	EIA – Assessment Conclusions	Draft DCO / Outline Management Plans / Mitigation and Monitoring
Chelmsford City Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion
Brentwood Borough Council	Under discussion	Agreed	Under discussion	Under discussion	Under discussion	Under discussion
Basildon Borough Council	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion

Responses to New Matters and Applicant Clarifications

- 4.15.11 The table below sets out the Applicant's response to the matters raised in the Local Impact Reports that the Applicant previously has not addressed in their documents, including Statements of Common Ground with Local Authorities or in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**.

Table 4.28 Cumulative effects – responses to new matters and Applicant clarifications

ID	Stakeholder	Comment	NG response
3.1.7	South Norfolk District Council	Attention is drawn to the location of the Hornsea Project Three converter station, the Energy Balancing Infrastructure, other infrastructure for the provision and storage of energy, the East Pye Solar Farm and associated BESS, as well as the various Town and Country Planning Act (TCPA) applications for solar farms and Battery Energy Storage Systems (BESS) situated along the route, as outlined above.	Cumulative effects with the Hornsea Project Three and supporting infrastructure, and various Town and Country Planning Applications are reported in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]. Cumulative effects with East Pye Solar Farm and BESS (EN0110014) were considered within 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]. This project did not fall within the Zones of Influence for

ID	Stakeholder	Comment	NG response
			environmental topics; therefore, the project was not assessed further.
5.2.1 and 5.2.2	South Norfolk District Council	Several NSIPs within or near the district interact with the proposed overhead line corridor. These include: • A47 – A11 Thickthorn Junction (TRO10037): Consent granted October 2022 and now under construction; • East Pye Solar Farm (500MW) and BESS (EN0110014): Pre-application; submission anticipated February 2026; • Hornsea Three Offshore Wind Farm (EN010080): Consented December 2020; construction underway including the converter station; • Sheringham and Dudgeon Offshore Wind Farm Extensions (EN010109): Consented April 2024 and pre-commencement surveys underway; • Tasway Energy Park (700MW Solar + BESS): Paused pending future grid connection after non-statutory consultation. These NSIPs collectively form a major part of the region’s transition toward renewable energy generation and transmission. Their proximity to the draft Order Limits increases the potential for cumulative impacts on landscape character, ecological resources, local amenity and construction-phase disruption.	The Project has been made aware of the A47 – A11 Thickthorn Junction project (TR010037) since the submission of the Development Consent Order application. The consented development has been captured within an updated long list of other existing and / or approved developments (pre-April 1 2025 list). If significant cumulative effects are identified, these will be reported in updated Environmental Statement documents (where relevant) and submitted into the Examination process. Cumulative effects with East Pye Solar Farm and BESS (EN0110014) were considered within 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]. This project did not fall within the Zones of Influence for environmental topics; therefore, the project was not assessed further. Cumulative effects with Hornsea Three Offshore Wind Farm (EN010080) were assessed in the inter-project cumulative effects assessment within 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284], ID DCO1. Updates to timeframes of construction and operation of the other development since the original assessment was undertaken have been considered and updates to the conclusions of the cumulative effects assessment will inform updates to the 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134] submitted at Deadline 1.

ID	Stakeholder	Comment	NG response
			Cumulative effects with the Sheringham and Dudgeon Offshore Wind Farm Extensions (EN010109) were assessed within 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284], ID DCO6. The Project has been made aware of Tasway Energy Park since the submission of the Development Consent Order application. The development has been captured within an updated long list of other existing and / or approved developments (post-April 1 2025). If significant cumulative effects are identified, these will be reported in updated Environmental Statement documents (where relevant) and submitted into the Examination process.
5.3.2	South Norfolk District Council	A full list is included at Appendix C and examples include: • Major housing and employment development west of the A140 in Long Stratton (2018/0112); • Multiple employment, logistics and industrial phases at Ipswich Road, Keswick (2021/1034–1039); • Numerous solar farm and BESS applications across the district (e.g., 2021/2495, 2021/2645, 2023/0617, 2023/1055). • Grid connection infrastructure for consented NSIPs (e.g., Hornsea • Three, Bloy’s Grove Solar Farm); • Country park and mixed-use development in Caistor St Edmunds (2022/2148);	Multiple employment, logistics and industrial phases at Ipswich Road, Keswick (2021/1034–1039) were not identified at the time of Development Consent Order (DCO) submission. The developments have been captured within an updated long list of other existing and / or approved developments (pre-April 1 2025). If significant cumulative effects are identified, these will be reported in updated Environmental Statement documents (where relevant) and submitted into the Examination process. All other developments noted were considered within 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]. Grid connection infrastructure for consented Nationally Significant Infrastructure Projects (e.g. Hornsea, Bloy’s Grove Solar Farm) have been assessed in accordance with the level of detail available in planning documents

ID	Stakeholder	Comment	NG response
		- Battery storage and grid reinforcement infrastructure adjacent to Norwich Main Substation, including the 2024 substation extension; - A broad range of residential developments across villages including Diss, Roydon, Newton Flotman, Bracon Ash, Aslacton and others.	at the time of the cumulative effects assessment for these developments at DCO submission – in accordance with guidance.
7.3.2	South Norfolk District Council	Significant new infrastructure has been consented or is proposed in close proximity to the draft Order Limits, including extensions to Norwich Main Substation and projects associated with Hornsea Three, Bloy's Grove Solar Farm and other NSIPs. This contributes to a cumulative intensification of energy infrastructure in the local area	Developments listed were assessed within 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284] .
8.5.1	South Norfolk District Council	The cumulative impact of this project with other NSIPs, solar farms, BESS schemes and grid reinforcements is a major concern. South Norfolk is hosting a substantial concentration of large-scale infrastructure. A strategic approach to the implementation of projects delivered by way of Energy Infrastructure in the area should be required by way of an area wide Energy Infrastructure Plan which inter alia could deliver: - A shared understanding of the connection capacity; - Coordination of construction periods; - Coordinated access tracks and construction compounds; - Locally shared ecological mitigation sites - Local cumulative compensation and community mitigation fund.	The Energy Market is a free market where applicants apply to connect to the transmission system. The Applicant is obliged to connect any generation customer who signs a connection offer from the National Energy System Operator. The connecting generation customers fund their projects independently and must secure the appropriate land rights and necessary planning approvals such as a Development Consent Order or planning approval under the Town and Country Planning Act 1990 considering cumulative effects with other developments as necessary. The Applicant has neither legal authority, regulatory role nor funding to exert control over this process in the manner suggested but notes that those with planning approval responsibilities can influence the outcome and secure co-ordination to some degree. In the specific case of the East Anglia Connection Node, the overlapping construction programmes and cumulative

ID	Stakeholder	Comment	NG response
		A strategic approach would align with strategic planning can be justified and avoids piecemeal harm. Without such measures, the cumulative burden on South Norfolk is inconsistent with sustainable development.	effects with the two generation customers support a co-ordinated and cooperative approach that lowers overall costs and environmental effects.
12.4.1	South Norfolk District Council	This appendix sets out the full list of NSIPs and major TCPA applications referenced in Section 4 and Section 7 of this LIR, including: • A47–A11 Thickthorn Junction; • East Pye Solar Farm; • Hornsea Three Onshore Works; • Sheringham and Dudgeon Extensions; • Multiple solar farms, BESS projects and grid-related schemes across the district.	Several developments within the appendix were not captured within the original cumulative effects assessment considered at Development Consent Order submission. These include: A47 – A11 Thickthorn Junction, 2021/1034 - 2021/1039, 2022/1344, 2022/1975, 2022/1976, 2022/2350, 2023/3574, 2024/1245, 2024/1734, 2024/2152, 2024/3786, 2024/3858 (pre-April 1 2025 list), and 2025/2930, 2025/3957 which were identified but scoped out from the post-April 1 2025 list as they are over 3 km away from the Project. These developments have been captured within an updated long list of other existing and / or approved developments. If significant cumulative effects are identified, these will be reported in updated Environmental Statement documents (where relevant) and submitted into the Examination.
6.2.22	Thurrock Council	The southern part of the route, between Orsett Golf Course and Chadwell St Mary is located adjacent to the route of the LTC. In the area southeast of Orsett Golf Course the proposed new structures and landscape mitigation planting for both schemes abut each other as set out in 9.9 OLEMP. It will be essential that there is coordination of the proposed mitigation planting between the two projects.	Coordination is ongoing with the Lower Thames Crossing (LTC) project team and the Norwich to Tilbury Project team. 8.3.4 Draft Statement of Common Ground – Lower Thames Crossing [REP1-075] shows the status of ongoing discussions. In addition, 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134] submitted at Deadline 1 details the approach taken by the Applicant to coordinate the Project with the other projects, including a summary log of discussions with

ID	Stakeholder	Comment	NG response
			the developers of the projects both pre-application and pre-examination.
8.2 – 8.3	Brentwood Borough Council	In respect of the inter-project cumulative effects, the ES acknowledges that from 2027-2030 there will be an overlap between the LTC scheme and the NGET Project. Other than for Landscape and Visual (construction and operation) and Agriculture and Soils (construction, operation and maintenance), impacts have been identified as negligible or minor adverse, and therefore deemed not significant. BBC considers that contrary to being not significant, the co-location and overlapping construction timeframes are likely to amplify adverse effects across multiple receptors, including traffic, noise, air quality, health and wellbeing, and community amenity – particularly in areas such as Haverings Grove – and that detailed phasing information on the NGET Project is required to develop suitable mitigation against this. Furthermore, while the Applicant has indicated engagement with National Highways to address cumulative impacts, no substantive evidence has been provided to demonstrate how these will be effectively mitigated and National Highways continues to raise its own concerns in this regard.	5.9.20 Draft Statement of Common Ground - National Highways [REP1-048] shows the status of ongoing discussions with National Highways.
8.4	Brentwood Borough Council	BBC also reiterates previous concerns on inter-project cumulative effects regarding the wider Brentwood Southern Growth Corridor, which includes DHGV and Brentwood Enterprise Park. For DHGV, other than for Landscape and Visual (construction, operation and maintenance), Agriculture and Soils (construction, operation and maintenance), and Historic Environment (construction, operation and	6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] , paragraph 17.6.4 states ‘ <i>A change in construction programme such as a later construction start date or an extended construction programme of works would change the temporal overlap with the construction of other developments considered within the inter-project cumulative effects assessment (e.g. some other</i>

ID	Stakeholder	Comment	NG response
		maintenance), impacts have been identified as negligible and not significant. BBC disputes this assessment and considers that it has been informed by inadequate detail of the parallel phasing plans of the respective projects, leading to a general underestimation of the true cumulative impacts and the mitigation required to address them.	<i>developments would be constructed prior to the Project, and others would be in construction at the same time as the Project). However, no developments identified within the long list of other developments [APP-283] were screened out due to a construction start date being after the assumed operational date of the Project (2031). Therefore, no new or different significant inter-project cumulative effects were identified if the construction programme were to be delayed.'</i>
8.5	Brentwood Borough Council	In terms of intra-project cumulative effects, again in light of the absence of detailed works phasing, BBC remains unconvinced that impacts have been correctly identified and therefore that proper mitigation can have been given due and proper consideration. This is particularly the case in areas such as Haverings Grove, and whilst the Applicant has identified that Woodland Schools – Hutton Manor and Little Acorn will suffer residual cumulative construction effects, these have been assessed as minor adverse and not significant. However, as the Order Limits in this location cover an extensive area with multiple access points, including hosting a satellite compound, and cross the key A129 Rayleigh Road transport route, and the proposed works include both the decommissioning of 132kV OHL and construction of 400kV OHL, BBC considers that further assessment of cumulative impacts needs to be undertaken and suitable mitigation identified.	6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] by competent experts. No further assessment or mitigation is considered to be required.
8.6	Brentwood Borough Council	BBC considers that both the intra-project and inter-project cumulative impacts have not been adequately assessed in accordance with national policy and	6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288

ID	Stakeholder	Comment	NG response
		requests that the Applicant be obliged to provide a more robust cumulative effects assessment and commit to enforceable phasing and mitigation measures within the DCO.	– APP-296] and 6.20 Scoping Opinion [APP-297] by competent experts. No further assessment or mitigation is considered to be required and enforceable phasing is not required. Further, National Policy Statement EN-1 (2024), paragraph 4.3.3 states ‘<i>The Regulations require an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects</i>’. This paragraph also includes the following footnote 104 which states ‘<i>For guidance on the assessment of cumulative effects, see, for example, PINS Advice Note 17 regarding Cumulative Effects Assessment (August 2019) see https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/12/Advice-note-17V4.pdf. The Environmental Statement therefore, complies with National Policy and the Planning Inspectorate’s guidance.</i>
8.7	Brentwood Borough Council	BBC also requests that when further information is available on all of the intra-project work phasing for the 2027-2030 period, that the Applicant explore alternative access options aligned with the phasing of DHGV and applicable LTC work to reduce harm and maintain safe and efficient operation of the local highway network.	Intra-project cumulative effects occur when a resource, receptor or group of receptors are potentially affected by more than one source of direct environmental impact resulting from the same development ⁸⁸ . For example, a community may be affected by both noise and dust effects resulting from the construction phase

⁸⁸ Institute of Environmental Management and Assessment (2011) *Special Report – The State of Environmental Impact Assessment Practice in the UK*

ID	Stakeholder	Comment	NG response
			activities of a single development. No further intra-project assessment work is proposed. The assessments presented in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and 7.11 Transport Assessment [APP-333] have considered the cumulative effects on the highway network of the combined Project and other committed developments. Coordination and collaboration with the Lower Thames Crossing project is ongoing regarding access, the combined impact of the projects and mitigation proposed where required.
10.3	Suffolk County Council and Babergh District Council	The Councils are concerned about cumulative workforce pressures. Norwich to Tilbury will overlap with Sizewell C, Sea Link, LionLink, and multiple offshore wind projects, creating intense competition for specialist skills in civils, mechanical and electrical trades, and project management. The ES conclusion that labour capacity is sufficient ([APP-281], Chapter 17) does not adequately address concurrent demand for these roles or explain the methodology used. Evidence from regional labour forecasts suggests this assumption is flawed. The Applicant should confirm that current workforce data and worst-case scenarios have been used, particularly given recent increases in peak workforce numbers at projects such as Hinkley Point C.	The majority of construction activities would require trained specialists who are qualified to work on high voltage electricity lines. These are typically sourced from the Applicant's existing pool of approved contractors. The number of jobs supported by the Project is relatively low – approximately 480 jobs locally across the 180 km route over the four-year construction period. Hence, a not significant cumulative effect is anticipated when considering the cumulative workforce with other developments.
10.66	Suffolk County Council and Babergh	The cumulative impact assessment [APP-281] concludes effects are not significant as although the scale of construction employment generated	Please see the above response (ID.10.3) in relation to the anticipated scale of construction employment generation. The Census 2021 baseline data gathered

ID	Stakeholder	Comment	NG response
	District Council	is likely to be relatively large when compared with the pool of construction labour, that the demand on construction labour would be spread across the construction period (17.5.62-17.5.63). However, this conclusion does not fully address the risk of concurrent demand for specialist skills, nor does it explain how this finding was reached. Evidence from regional skills reports and NSIP labour forecasts suggests this assumption is flawed, as competition for roles such as electrical engineers, civil engineers, and welders is likely to be intense. The Applicant should confirm that current workforce data has been used in assessing worst-case scenarios, particularly given that Sizewell C's sister project, Hinkley Point C, has increased its peak workforce numbers since the Environmental Statement was completed.	as part of the socio-economics, recreation and tourism assessment set out in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] suggests that the construction industry group had 60,000 employees in the Wider Study Area. Therefore, the anticipated 480 construction jobs locally across the 180 km route over the four-year construction period are not considered to be significant.
10.73	Suffolk County Council and Babergh District Council	Norwich to Tilbury is likely to generate a small number of operational roles, Environmental Statement has scoped operational employment impacts out of the assessment. This is despite the Councils' view that these effects are relevant, especially when considered cumulatively with other NSIPs and the need to support long-term economic resilience in the local area.	The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 require an Environmental Statement to provide '<i>A description of the likely significant effects of the development on the environment</i>'. Operational workforce numbers would not lead to likely significant effects in isolation or cumulatively with other developments which is why they are scoped out of the inter-project cumulative assessment. 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297].

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10.74	Suffolk County Council and Babergh District Council	The project is part of a growing cluster of energy assets, including Sizewell B and C, EA1N/2 substations, and LionLink, which collectively require a skilled operational and maintenance workforce. It is therefore short-sighted to treat operational employment in isolation and dismiss its cumulative regional importance.	The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 require an Environmental Statement to provide ‘ <i>A description of the likely significant effects of the development on the environment</i> ’. Operational workforce numbers would not lead to likely significant effects in isolation or cumulatively with other developments which is why they are scoped out of the inter-project cumulative assessment.
12.170	Suffolk County Council and Babergh District Council	SCC is disappointed that the applicant has not considered Traffic and Transport in their inter-project cumulative assessment [APP-284] with regards to the Bramford to Twinstead project which may still be being constructed when this project is planned to commence. Key areas of cumulative interproject impact are considered to be: i. The area around the Bramford substation. Both projects will be connecting into the substation, which is only accessed via one narrow road. Mitigation has been proposed by the Norwich to Tilbury project for junction and carriageway widening, however the increased traffic will still have an adverse impact on local residents and the village of Bramford in general. ii. The length of the A140, from the A14 to the A143. Whilst not a specific construction route for this project, it is highly likely that workers will be using this road on their way to one of the projects access points. This is in addition to this road being used as an AIL route. As this is one of the	6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281], paragraph 17.5.21 states that ‘<i>The baseline traffic numbers against which the effects of construction traffic have been assessed and reported in [6.7 Environmental Statement Chapter 7 - Air Quality [APP-147], 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] and 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]], includes any traffic that would be generated by committed or other development. The assessment of construction traffic is therefore inherently cumulative in the Air Quality, Noise and Vibration and Traffic and Transport assessments and is therefore not considered in the Stage 4 assessment</i>’. Therefore, construction traffic generated from the Bramford to Twinstead project is considered within 6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271].

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		main key routes through Suffolk, other NSIP projects also use this road for AIL and HGV movements. An example is the East Pye Solar Farm proposed in Norfolk, which has the A140 as a potential AIL route. iii. Future projects which may interact with this project include EcoPower and elements of the Suffolk Water Recycling and Treatment Centre, which are both currently at the pre-app stage. Whilst the overlap of these projects with Norwich to Tilbury will be less than those of Bramford to Twinstead, there is still potential for an even more significant increase in traffic along the A140 and A143 corridors.	
13.155	Suffolk County Council and Babergh District Council	At paragraph 17.4.17 of ES Chapter 17 - Cumulative Effects [APP-281] the common receptors that have potential to give rise to intra-project cumulative effects and therefore included in the assessment are identified only as Land and Community Assets, Development Land and Businesses, and Pedestrians, Cyclists and Horse Riders and these only at Construction Stage. The Councils are concerned that no intra-project cumulative effects are identified at the Construction and Operational Stage for Agricultural and Soil, Landscape, Ecology and Historic receptors.	Table A17.1.1 in 6.17.A1 Environmental Statement Appendix 17.1 – Intra-Project Cumulative Effects [APP-282] states: • Agriculture and Soil – ‘<i>Intra-project effects are intrinsic in the assessment presented in [6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]].</i>’ • Landscape – ‘<i>Intra-project effects are intrinsic in the assessment presented in [6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]].</i>’ for a number of aspects • Ecology – ‘<i>Intra-project effects are intrinsic in the assessment presented in [6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]].</i>’ • Historic receptors – ‘<i>Intra-project effects are intrinsic in the assessment presented in [6.11</i>

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			Environmental Statement Chapter 11- Historic Environment [AS-068]]’. Detail is also provided as to why intra-project cumulative effects are intrinsic in the assessments. Therefore, the Applicant can confirm that intra-project cumulative effects are identified at the construction and operation (and maintenance) stage for agricultural and soil, landscape, ecology and historic receptors and are considered within the Environmental Statement.
13.156	Suffolk County Council and Babergh District Council	Significant cumulative effects at the Construction stage are identified on Pedestrians, Cyclists and Horse Riders in many Visual Receptor Areas (“ VRA ”) and yet Paragraph 17.4.21 [APP-281] identifies ‘... no additional mitigation measures were identified in addition to those already identified within the environmental topic assessments’. The decision-making assumptions that gave rise to these conclusions need clarifying. In these circumstances the Councils would argue that a compensatory sum should be provided as part of a side agreement for significant cumulative effects that cannot be further mitigated.	A response on financial compensation for residual significant effects is provided in Socio-economics, Recreation and Tourism - Community Benefits section of this report.
13.157	Suffolk County Council and Babergh District Council	Paragraph 17.4.18 [APP-281] identifies that ‘No effects on common receptors during the operation (and maintenance) phase of the Project have been identified which could give rise to intra-project cumulative effects and are therefore not considered further.’ The Councils query this in relation to Agricultural and soil receptors, Landscape, Ecology and Historic receptors.	No common receptors were identified during operation (and maintenance), therefore there is no potential for intra-project cumulative effects. Intra-project effects are intrinsic in the assessment presented within 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138], 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.11 Environmental

ID	Stakeholder	Comment	NG response
			Statement Chapter 11- Historic Environment [AS-068]. There were no effects identified on the same receptor in any other environmental topic chapter of the Environmental Statement for these receptors.
17.3	Suffolk County Council and Babergh District Council	Cumulative impacts present a further major concern. Whilst the Applicant acknowledges that combined noise, visual and access effects may be significant for certain groups, it concludes that inter-project effects on health and wellbeing are negligible and proposes no mitigations. This creates a notable gap given the potential for prolonged uncertainty, repeated disruption and progressive environmental change to erode community amenity, sense of place and mental wellbeing over time. The absence of dedicated mental health monitoring limits the ability to identify, respond to and mitigate emerging adverse impacts, particularly for those living closest to the works and for vulnerable groups with fewer options for respite.	6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has considered the impact of other construction projects on health and wellbeing, particularly as they relate to environmental change (including noise, air quality, landscape and visual effects and effects relating to Public Rights of Way). Paragraph 17.5.47 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] notes that, in a number of instances, adverse effects on mental health and wellbeing may be particularly relevant as a result of the scale of other development (for example significant residential or infrastructure development) and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction phases. The conclusion of the assessment is that inter-project effects at a population level are negligible and not significant. As such, no specific monitoring relating to health and wellbeing is required. The Applicant recognises that uncertainty whilst the proposals are developed may cause anxiety. The Applicant has 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

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			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.
17.47	Suffolk County Council and Babergh District Council	Whilst Public Health acknowledge the Applicant's efforts to minimise disruption and provide mitigation, we remain concerned that the assessment does not fully capture the combined ongoing and cumulative effects, particularly on vulnerable groups and in locations where multiple disruptions coincide or where communities are already experiencing health inequalities. In practice, even minor or short-term disruptions can have a material and disproportionate impact on daily physical activity, wellbeing, and social cohesion for those most dependent on these local assets.	The Applicant has engaged with other developers who are proposing development in proximity of the Project to understand their requirements and incorporated this into 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] where relevant. 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] by competent experts and no significant inter-project cumulative effects on health and wellbeing have been identified. The Applicant does recognise that uncertainty whilst the proposals are developed may cause anxiety and has 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 the progress of the Project, through regular communication including letters, phone calls and meetings.
17.54	Suffolk County Council and Babergh District Council	[APP-281] 17.4.22 explains that “ <i>No monitoring is proposed during construction or operation (and maintenance).</i> ” This appears a notable gap given the identified potential for adverse effects that Public Health suggest may extend into impacts on physical activity levels, mental	No significant health and wellbeing intra-project cumulative effects were identified, therefore no monitoring is proposed or required during operation (and maintenance). Instead, Table A17.1.1 in 6.17.A1 Environmental Statement Appendix 17.1 – Intra-Project Cumulative Effects [APP-282] states that ‘ <i>Intra-project cumulative effects are intrinsic in the</i>

ID	Stakeholder	Comment	NG response
		wellbeing, and community amenity.	<i>assessment presented in [6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]]</i> and provides further detail on which aspects are intrinsic to the health and wellbeing assessment.
17.56	Suffolk County Council and Babergh District Council	However, despite recognising these potential pressures, the Applicant concludes that inter-project effects on health and wellbeing during construction and operation would be “negligible and not significant”, and does not propose specific mitigation to address inter-cumulative effects on mental health and wellbeing. This conclusion is reached even though cumulative construction activity may extend, intensify, or compound the duration and magnitude of disruption, particularly for communities exposed to multiple large projects either concurrently or in close succession and relies heavily on the assumption that other developers will consistently deliver BPM mitigation to a high standard, an assumption that may not be realistic in practice.	Measures to address inter-project cumulative effects will include the Applicant’s ongoing approach to communication and engagement with affected local communities during the construction phase of the Project. The Applicant will continue to review construction timelines of other large projects that may have a direct impact on construction of the Project; however, the Applicant is not responsible for whether developers of other projects deliver mitigation to an appropriate or approved standard.
17.57	Suffolk County Council and Babergh District Council	SCC considers that, in respect of cumulative impacts, the approach set out within assessments [APP-281] and [APP-192] does not fully reflect the lived experience of affected communities, nor does it adequately capture the psychological and social impacts of prolonged uncertainty, repeated disruption, and the progressive industrialisation of the local environment. The cumulative sense of	The health and wellbeing assessment is informed by feedback from statutory and non-statutory consultation which has identified themes of common concern or interest to local residents. 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] by competent experts. The health and wellbeing

ID	Stakeholder	Comment	NG response
		disruption, loss of amenity, and erosion of place identity, especially where multiple NSIPs are present or anticipated, has the potential to exacerbate adverse mental health outcomes beyond those reflected in the Applicant's "negligible" classification. These impacts are likely to be felt most acutely by vulnerable groups, including older people, disabled residents, and those without access to private transport, who may have fewer practical options for respite or alternative access to social infrastructure and green or blue spaces.	assessment has considered cumulative impacts particularly as they relate to environmental change (including noise, air quality, landscape and visual effects and effects relating to Public Rights of Way). 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281], paragraph 17.5.47 notes that, in a number of instances, adverse effects on mental health and wellbeing may be particularly relevant as a result of the scale of other development (for example significant residential or infrastructure development) and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction phases. The conclusion of the assessment is that inter-project effects at a population level are negligible and not significant. The Applicant does recognise that uncertainty while the proposals are developed may cause anxiety and has 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.
17.81	Suffolk County Council and Babergh District Council	Public Health also recommend the applicant maintain flexibility in mitigation and monitoring plans to respond to unforeseen cumulative impacts, especially if construction timelines or project overlaps change.	It is understood that the construction timelines of other projects may change and evolve. 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.

ID	Stakeholder	Comment	NG response
2.5.11	Essex County Council	ECC is concerned that the Norwich to Tilbury project could result in detrimental socio-economic impacts for Essex, particularly affecting local businesses, residents, and the tourism sector. The scale and nature of the development, alongside other concurrent infrastructure projects, raises the risk of cumulative disruption to the local economy, including reduced footfall for tourism-dependent areas, strain on local services, and displacement of existing business activity.	6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] by competent experts and no significant inter-project cumulative effects on socio-economic receptors have been identified.
4.4.10	Essex County Council	In Appendix 17.2 of the ES (APP-281), the list of committed development's in Essex is extensive with 59 planning applications identified of which 5 are NSIPs, and 3 are new Garden Communities. All of these have the potential to contribute to the in-combination effect on the operation of the County's highway network.	Committed developments included within the traffic data which has informed the assessments within the Environmental Statement are provided in 6.16.A3 Environmental Statement Appendix 16.3 – Future Baseline [APP-274] . 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and 7.11 Transport Assessment [APP-333] consider the cumulative effects on the highway network with the Project and other committed developments.
4.4.11	Essex County Council	ECC have also identified a handful of sites that are in the planning system that have not been included in the assessment of cumulative impact affecting Billericay, Witham, and Great Notley. A summary of the sites is given in the table below <i>Figure G – Summary of Development Sites – Billericay, Witham & Great Notley</i>	The Witham development site (19/01896/OUT) and Great Notley development (23/02807/OUT) fall outside of the Zones of Influence used in the cumulative effects assessment to identify other existing and/or approved developments and were therefore not considered further. The Billericay development was initially considered under ID BA4 within 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283] , however the application (24/00004/OUT) was

ID	Stakeholder	Comment	NG response
			withdrawn, and therefore not considered further. The Billericay development application (24/00980) has been identified since Development Consent Order (DCO) submission (pre-April 1 2025 list) and will be considered. If there are changes to the conclusions reported in the Environmental Statement, then these will be reported during Examination. For the assessment within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271], the Witham Development site (19/01896/OUT) and Billericay development application (24/00980) are not considered due to insufficient traffic data for the construction phase. The Great Notley development (23/02807/OUT) has been reviewed. The additional traffic movements associated with the development would overlap with PAR 44 – A131 Great Notley Bypass; however, this would not result in a change to the conclusions reported in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. A review of the junction modelling for Site 56 – A120 Braintree Bypass / A131 Great Notley Bypass has been undertaken to update the committed development traffic movements to include the Great Notley development (23/02807/OUT). It was found that the junction would continue to operate within capacity with the introduction of the Project, therefore the findings reported within the 7.11 Transport Assessment [APP-333] have not changed.
4.4.26	Essex County Council	The following table sets out the strategic sites and clusters of major sites that are currently in the planning system	Several development sites were captured under council planning applications or allocated sites within the cumulative effects assessment submitted with the application for development consent. Since the cut-off

ID	Stakeholder	Comment	NG response
		<i>Table D – Summary of Strategic / Major Site Development Project Status</i>	date for the assessment (1 April 2025), several of these allocated sites now have planning applications. We will consider the new planning applications for these developments and update the conclusions of the Environmental Statement during Examination where significant effects are identified. Several development sites have not been considered for the cumulative effects assessment as they do not fall within the Zones of Influence (ZOIs) for the environmental topics. These include Brentwood Enterprise Park, Hedgehog Grove Solar Farm, Hartley Gardens, Witham, and Maldon. The Project will review any additional applications listed that fall within the ZOIs for the cumulative effects assessment and consider these. If there are changes to the significant effects reported in the Environmental Statement, then these will be reported during Examination.
4.4.58	Essex County Council	In respect of cumulative mental health and wellbeing impacts, communities in Colchester, Basildon and Tendring experience high prevalence of anxiety and depression and low resilience, as highlighted by the Joint Strategic Needs Assessment, also high social isolation, and economic vulnerability. Cumulative change to landscapes (particularly in Dedham Vale, Chelmsford Rural West, Brentwood) can lead to loss of attachment to place and loss of identity. Cumulative impacts need to consider the impact of recurrent PRoW and access disruption from multiple overlapping projects which impacts cyclists and pedestrian, consider compounded community	6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297]. 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has considered the impact of other construction projects on health and wellbeing, particularly as they relate to environmental change (including noise, air quality, landscape and visual effects and effects relating to Public Rights of Way (PRoWs)). Paragraph 17.5.47 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] states that, with the implementation of best practicable means (BPM) and other mitigation

ID	Stakeholder	Comment	NG response
		severance when multiple schemes restrict movement increasing social isolation, dependence of cars and older and disabled residents being disproportionately impacted.	measures as part of other developments, there would be no adverse effects from environmental change in relation to these topics. In relation to PRowS, appropriate PRow management measures (for example diversion routes) would be implemented to minimise disruption to physical activity.
4.4.60	Essex County Council	Request for a Cumulative Health and Wellbeing Statement setting out all interacting projects, timelines, and health pathways. This relates to the request for a Health and Wellbeing Monitoring Framework including mental health metrics, active travel use, air quality, noise exposure, and community engagement levels together with clear commitments to community benefits to offset cumulative burden in most affected parishes with dedicated cumulative impact mitigation fund for PRow enhancements, local mental health support and Green Infrastructure ("GI") improvements.	The findings from a cumulative assessment of Project impacts on health and wellbeing, including assessment of inter- and intra-project effects are presented in 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]. Controls, mitigation measures and monitoring for the impacts associated with the construction of the Project are detailed within 7.3 Outline Construction Traffic Management Plan [APP-309]. Monitoring of the effects on the amenity of Primary Access Routes for walkers and cyclists will be undertaken by the appointed Construction Logistics Manager, as secured through 7.3 Outline Construction Traffic Management Plan [APP-309]. There is no requirement for monitoring measures for health and wellbeing because no significant effects have been identified in the assessment undertaken in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192].
4.4.63	Essex County Council	At paragraph 17.4.17 (APP-281), the common receptors that have potential to give rise to intra-project cumulative effects and therefore included in the assessment are identified only as Land and	Table A17.1.1 in 6.17.A1 Environmental Statement Appendix 17.1 – Intra-Project Cumulative Effects [APP-282] states: • Agriculture and Soil – <i>'Intra-project effects are intrinsic in the assessment presented in [6.6</i>

ID	Stakeholder	Comment	NG response
		Community Assets, Development Land and Businesses, and Pedestrians, Cyclists and Horse Riders and these only at Construction Stage. Place Services. ECC is concerned that no intra-project cumulative effects are identified at the Construction and Operational Stage for Agricultural and Soil, Landscape, Ecology and Historic receptors.	Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]].’ • Landscape – ‘<i>Intra-project effects are intrinsic in the assessment presented in [6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]].’</i> for a number of aspects • Ecology – ‘<i>Intra-project effects are intrinsic in the assessment presented in [6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]].’</i> • Historic receptors – ‘<i>Intra-project effects are intrinsic in the assessment presented in [6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]].’</i> Detail is also provided as to why intra-project cumulative effects are intrinsic in the assessments. Therefore, the Applicant can confirm that intra-project cumulative effects are identified at the construction and operation (and maintenance) stage for agricultural and soil, landscape, ecology and historic receptors and are considered within the Environmental Statement.
4.4.64	Essex County Council	Significant cumulative effects at the Construction stage are identified on Pedestrians, Cyclists and Horse Riders in many Visual Receptor Areas (“ VRA ”) and yet Paragraph 17.4.21 (APP-281) identifies ‘... no additional mitigation measures were identified in addition to those already identified within the environmental topic assessments’ (ECC underlining). The decision-making assumptions that gave rise to these conclusions need clarifying. In these circumstances, it is argued that a	A response on financial compensation for residual significant effects is provided in the Socio-economics, Recreation and Tourism - Community Benefits section of this report.

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		compensatory sum should be provided as part of a Side Agreement for significant cumulative effects that cannot be further mitigated	
4.4.65	Essex County Council	Paragraph 17.4.18 (APP-281) identifies that ‘No effects on common receptors during the operation (and maintenance) phase of the Project have been identified which could give rise to intra-project cumulative effects and are therefore not considered further.’ This is queried in relation to Agricultural and soil receptors, Landscape, Ecology and Historic receptors.	No common receptors were identified during operation (and maintenance) therefore there is no potential for intra-project cumulative effects. Intra-project effects are intrinsic in the assessment presented within 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] , 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] , 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068] . There were no effects identified on the same receptor in any other environmental topic chapter of the Environmental Statement for these receptors.
4.4.71	Essex County Council	However, the limits of deviation included within the Draft Development Consent Order (APP-056) are a concern, due to the extent of the changes this will allow for movement and adaptation to the route as work commences. This matter is further covered in section 5.3 of this LIR.	Limits of Deviation are assessed within Section 17.6 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] .
4.4.75 – 4.4.78	Essex County Council	No significant inter-project cumulative effects have been identified for archaeological remains as part of the ES assessment. The reasoning for this is expanded in Section 17.5.52 (APP-281) which states: <i>“While there would be overlap of the Order Limits for other developments and the Project, effects to archaeology would only occur once by whichever construction would take place first. These effects</i>	6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] . The assessment of cumulative effects on archaeological remains considered whether the archaeological remains affected by the Project were likely to extend significantly into the area affected by the other development. On the basis of current

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		<i>would be mitigated as appropriate and agreed with the LPA (such as through excavation, recording, and publication). Any affected archaeology would be removed as a result of the mitigation/construction and therefore the inter-project effects for construction and operation (and maintenance) would be negligible and not significant.”</i> ECC is of the opinion that this statement is not correct as the cumulative effects would be derived from the increase in land take across the combined Order Limits of both or more projects and not from overlap. For example, in Tendring District a separate substation is planned to be erected adjacent to the substations required for both Five Estuaries and North Falls Offshore Windfarms and not within the same parcels of land. Similarly, the Lower Thames Crossing within Thurrock District will result in a significant impact on archaeological remains that would be increased by the groundworks required for the construction of a substation for Norwich to Tilbury as well as pylon bases and associated infrastructure. ECC is therefore of the opinion that the cumulative impact of the project would be because of the increase in the total area of land take and not overlap as proposed by the Applicant, and as a result, the scale of potential archaeological remains which could be lost as a result of the mitigation / construction is increased. Archaeological remains are a finite and non-renewable resource. This cumulative impact may not be determined as significant through the process of the assessment but should be considered an	information this was not expected to be significant and therefore the cumulative assessment concluded negligible and not significant effects for the construction phase (see 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]). Effects on archaeology more broadly i.e. the cumulative effect on archaeology within an area from multiple developments was not assessed as it would be difficult to define a study area / zone of influence that sensibly reflects the scale of the archaeological sites and in addition, each development would implement its own mitigation.

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		adverse effect of the project wherever they are removed. As the nature of the archaeological remains that may be affected is currently unknown, the impact and significance cannot be determined effectively through this form of assessment. While mitigation by record may reduce the cumulative impact in EIA terms, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted (NPPF, 2004 Paragraph 218)- this matter must be considered by the Applicant accordingly, and where necessary, controlled accordingly through the DCO.	
6.2.22	Thurrock Council	The southern part of the route, between Orsett Golf Course and Chadwell St Mary is located adjacent to the route of the LTC. In the area southeast of Orsett Golf Course the proposed new structures and landscape mitigation planting for both schemes abut each other as set out in 9.9 OLEMP. It will be essential that there is coordination of the proposed mitigation planting between the two projects.	Coordination is ongoing with the Lower Thames Crossing project team and the Norwich to Tilbury Project team. 8.3.4 Draft Statement of Common Ground – Lower Thames Crossing [REP1-075] shows the status of current discussions. 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134] submitted at Deadline 1 details the approach taken by the Applicant to coordinate the Project with the other projects, including a summary log of discussions with the developers of the projects both pre-application and pre-examination.
6.7.22	Thurrock Council	The Project is located within an area of ongoing development pressure, including highway improvements, and other nationally significant infrastructure proposals affecting Thurrock. In particular, the LTC DCO will introduce additional construction activity, TM requirements, and temporary access constraints. In combination, these activities could place cumulative pressure	6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] . No significant inter-project cumulative effects on socio-economic receptors have been identified. The baseline traffic numbers against which the effects of construction traffic have been assessed and

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		on business operations, access to strategic employment areas, workforce availability, and supply chains, especially where construction programmes overlap. Without effective coordination and responsive mitigation, cumulative impacts could undermine business continuity and investment confidence in an area that plays a critical role in the regional and national economy.	reported in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] includes any traffic that would be generated by committed or other development. 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] concludes that with mitigation in place there would be no significant effects.
6.8.6	Thurrock Council	Paragraph 4.4.5 - The impacts of more than one development may affect people simultaneously, so the applicant should consider the cumulative impact on health in the ES where appropriate. In response, the Council comment that while the applicant has undertaken a Cumulative Assessment the information from this has not been drawn through into the ES 'Chapter 10 – Health and Wellbeing' (Document 6.10) and this needs to be addressed to understand the potential cumulative impacts fully, particularly in relation to LTC.	6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] . The chapter considers the cumulative impacts from multiple projects on health and wellbeing. The Lower Thames Crossing is one of the projects included in the cumulative assessment. Paragraph 17.5.47 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] states that the implementation of best practicable means (BPM) and other mitigation measures as part of other developments would ensure that there would be no adverse effects from environmental change including noise, air quality and landscape and visual effects. Where other development presents a potential inter-project cumulative effect in relation to specific Public Rights of Way (PRoWs), appropriate PRoW management measures (for example diversion routes) would be implemented to minimise disruption to physical activity. Minor beneficial inter-project cumulative effects may be experienced in relation to construction job creation across a number of other

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			developments. In a number of instances, adverse effects on mental health and wellbeing may be particularly relevant as a result of the scale of other development (for example significant residential or infrastructure development) and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction phases.
6.8.7	Thurrock Council	Paragraph 5.11.6 - The Government's policy is to ensure there is adequate provision of high-quality open space and sports and recreation facilities to meet the needs of local communities. Connecting people with open spaces, sports and recreational facilities all help to underpin people's quality of life and have a vital role to play in promoting healthy living. In response, the Council's comment that this should be considered in terms of potential cumulative impacts arising from closure of other routes both associated with the Project but also with other developments coming forward e.g. LTC.	Paragraph 17.5.47 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] states that where other development presents a potential inter-project cumulative effect in relation to specific Public Rights of Way (PRoWs), appropriate PRoW management measures (for example diversion routes) would be implemented to minimise disruption to physical activity.
6.8.43 – 6.8.45	Thurrock Council	While the Council welcome many of the additional topics requested during the EIA Scoping for ES 'Chapter 10 – Health and Wellbeing' (Document 6.10) have been included, assessment of the cumulative health impacts have not been included, nor has any rationale been provided for why this is the case. While the Council note that a Cumulative Impact Chapter has been submitted as part of the ES submission, no information from this assessment has been	6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] .

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		brought forward into the ES 'Chapter 10 – Health and Wellbeing' (Document 6.10). It is still the Council's view that this topic should be included as part of the Health and Wellbeing Assessment, and this must be actioned to meet the requirements of the NPS EN-1. It is noted in the cumulative impacts chapter that there are several cumulative adverse impacts (from minor through to major adverse) relating to intra and inter-project impacts in 'Project Section H' which need to be understood further in terms of the localised adverse impact on health and wellbeing. Furthermore, the cumulative impacts relevant to health and wellbeing identified within the cumulative impact assessment provide only a general overview of cumulative health and wellbeing impact for the entire project and do not break this down by local authority area or by health topic. This makes it challenging to understand how conclusions have been reached and what the true potential health and wellbeing cumulative impacts may be.	
6.11.20	Thurrock Council	As with all projects of this scale, the GHG assessment concludes that the Project's emissions are not material in isolation. However, the Council remains concerned about the cumulative effect of multiple similar scale projects across the country. NPS EN-1 recognises that clustering and "in-combination" effects should be considered. The Council would therefore welcome consideration of how this Project	The Applicant acknowledges that it progresses a programme of projects which will include embedded carbon emissions from the construction of its projects. At a national level, the Applicant monitors its Scope 3 emissions (which includes Construction and Maintenance of its energy infrastructure).

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		interfaces with the wider national programme of infrastructure developments in terms of cumulative embodied emissions and the monitoring of cumulative outcomes over time.	Within our Climate Transition Plan 2023/2024⁸⁹ the Applicant has set commitments to reduce embedded carbon by driving efficiencies in the design phase of projects and working collaboratively with strategic suppliers to identify and trial innovative solutions to reduce construction impacts to net zero by 2050/51. In addition, the Applicant has committed to reducing greenhouse gas emissions which will be monitored as described in 7.2 Outline Code of Construction Practice Appendix H - Greenhouse Gas Reduction Strategy [APP-308].
8.25	Tendring District Council	While standard mitigation measures (e.g., soil stripping protocols, aftercare schemes, access management) are routinely proposed for NSIPs, including this one, their effectiveness in Tendring is fundamentally constrained by: • The intrinsic sensitivity of BMV soils, which suffer long-term productivity loss even under carefully managed disturbance. • The scale of construction that we are aware of, spanning multiple years and seasons, increasing the risk of cumulative compaction and irreversible soil structure damage – not to mention other NSIPs that may well follow as a result of the NGETs decision to place the infrastructure at the heart of BMV land. • The permanent change created by pylons and the EACN, which cannot be “mitigated” because land is lost forever.	The baseline soil characteristics are presented in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138], with the full survey report presented in 6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139] and the distribution of land grades (based on the Agricultural Land Classification (ALC) system) shown in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]. These, along with further surveys which have been committed to be undertaken pre-construction, provide the baseline against which the recovery and hand back of land affected temporarily can be assessed. The 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303] sets out the measures which will be implemented to effectively manage the soils which are disturbed and includes a requirement for a Soil Scientist role to

⁸⁹ National Grid (2024) *Climate Transition Plan 2023/2024*

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		The diversion of farming operations, which mitigation cannot meaningfully address once holdings are fragmented.	ensure the good practice measures (which are based on published guidance) are fully implemented. These measures account for situations where soils may be stockpiled for a number of years and include reconditioning measures to reverse any compaction as a result of handling and stockpiling. The Outline Soil Resource Plan also includes a commitment to an aftercare period to ensure reinstated soils are returned to their previous condition. The permanent loss of land, including the East Anglia Connection Node (EACN), is fully assessed in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138], and confirms the total permanent loss of agricultural land is significant. The assessment also covers the impacts to agricultural landholdings. Once construction is complete all land required temporarily will be returned to landowners and whilst there may be some restrictions to existing activities immediately over or adjacent to buried cables or under overhead lines these would be dealt with through compensation agreements (which lie outside of the Environmental Impact Assessment process).
10.2	Tendring District Council	NGET's ES Chapter 17 acknowledges the requirement to assess both intra-project and inter-project cumulative effects under the EIA Regulations and national policy (NPS EN-1 and EN-5). However, TDC finds that throughout the assessment it underestimates the scale, spatial concentration, temporal overlap, and in-combination harm that will arise when the N2T scheme is delivered alongside NF, FE, and the forthcoming TI. As set out elsewhere	6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] by competent and professional experts. Location of access routes, haul routes, service routes and service route crossing locations are presented on 6.4.F1 Environmental Statement Figure 4.1 – Proposed Project Design [APP-133] and 6.4.F2 Environmental Statement Figure 4.2 – Proposed

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		in the LIR, the ES also relies on inaccurate or erroneous information that informed key decision such as location of access routes, haul routes, service routes and service route crossing locations (for example at very sensitive and characterful rural lanes).	Project Design – Permanent Features [APP-134]. The Applicant is unclear from this comment what inaccurate and erroneous information is being referred to by Tendring District Council.
10.7 – 10.8	Tendring District Council	TDC fundamentally disagrees and considers this to be a substantial under-assessment. TDC's RR and indeed this LIR highlight very serious, wide-ranging and consequential cumulative impacts across (list not exhaustive): • Landscape and visual receptors, particularly given the arc-shaped pylon route imposed by the misplaced EACN location. • BMV agricultural land, where overlapping land-take from cable corridors, substations and pylons will cause unprecedented irreversible loss. • Residential amenity, where multiple PAR haul routes, pylon corridors, substations, and construction compounds overlap spatially and temporally. • Heritage assets, including cumulative setting changes to monuments, conservation areas and rural historic landscapes. • Community health and wellbeing, due to prolonged intrusive construction periods across multiple projects. • Traffic and transport, where HGV movements from several NSIPs risk multi-year network saturation in	6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] by competent and professional experts. Landscape – The assessment presented in 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] relating to landscape and visual receptors identifies major adverse and significant inter-project effects on the landscape of Bromley Heaths Landscape Character Area (both during construction and operation). As such the effects are not under-represented for landscape effects. The assessment also identifies moderate adverse and significant inter-project visual effects within Visual Receptor Area (VRA) C13 Little Bromley during construction. The Applicant notes an error in the reporting of inter-project visual effects during operation (and maintenance). The assessment should state that major adverse and significant cumulative effects are predicted within the VRA during operation (and maintenance) – this will be reflected in the next iteration of the Errata List (8.1 Errata List [Revision B]). Best and most versatile (BMV) agricultural land – The assessment presented in 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-

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		settlements and rural lanes unsuited for heavy vehicles. These issues are not identified, quantified, or addressed in the ES, despite clear visibility of their magnitude.	281] relating to agricultural land, and in particular BMV land, states that inter-project effects would be significant. As such the effects are not under-represented for this topic. Residential amenity – Future cumulative visual effects are not, as a rule, assessed within Residential Visual Amenity Assessments (see Technical Guidance Note 2/19⁹⁰) as cumulative visual effects on residential receptors are considered in relation to the Landscape and Visual Impact Assessment. Heritage assets – No significant cumulative effects were identified for any designated or non-designated heritage assets located within Tendring as set out in paragraphs 17.5.49 to 17.5.52 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]. The Applicant considers the conclusions of the cumulative assessment for the historic environment to be appropriate. Community health and wellbeing – Paragraph 17.5.47 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] states that, in a number of instances, adverse effects on mental health and wellbeing may be particularly relevant as a result of the scale of other development (for example significant residential or infrastructure development) and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction phases. Traffic and transport – Within 6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-

⁹⁰ Landscape Institute (2019) *Technical Guidance Note 2/19 Residential Visual Amenity Assessment (RVAA)*

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			271], committed developments combined with the Project flows contribute to the cumulative assessment for daily traffic increases against future baseline. Where required, mitigation measures (for example road widening and shared pedestrian and cyclist facilities) have been provided and considered when assessing the cumulative impacts arising from both the Project and all other committed developments to avoid severe residual cumulative impacts. These include both Nationally Significant Infrastructure Projects North Falls and Five Estuaries Wind Farms. The Tarchon Interconnector project was not included within the cumulative assessment for the Project as this planning application is still in early stages and no traffic information is yet available. However, this has been added to the post-April 2025 list as the construction of the proposed development and the Project may overlap. 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 the Environmental Statement then these would be published into Examination. In addition, the Tarchon Interconnector project will be required to undertake its own cumulative assessment with other developments as part of its respective development consent application.
10.9 – 10.10	Tendring District Council	The ES acknowledges that N2T alone generates widespread major adverse visual effects across north-west Tendring. TDC's RR demonstrates that these	A Stage 5 cumulative effects assessment has been undertaken within 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] . The

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		impacts will be substantially compounded when considered with: • The two offshore wind farm substations, directly adjacent to the EACN. • The multi-corridor underground cable systems entering the EACN. • The new arc of 50m+ pylons north of Ardleigh, with extreme angular deviation contrary to the Horlock Rules. • The anticipated Tarchon corridor, whose precise routing is unknown but will interact spatially with N2T. Taken together, these projects will fundamentally and permanently alter the landscape character of the Tendring Peninsula, including parts of the Dedham Vale National Landscape, in ways not fully reflected in the ES cumulative assessment.	Stage 5 assessment considers the impact of clusters of multiple other developments with the Project on a specific area or receptor. The assessment looked at where two or more other developments identified in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284] could affect a common receptor (e.g. LCA/LCT or VRA or the National Landscape) with the Project. Some developments have been identified since Development Consent Order submission, including the Tarchon Interconnector Project (post-April 2025 list). The Project will consider the potential for significant cumulative effects from the new developments identified such as the Tarchon Interconnector project and will update and submit into the Examination the Stage 4 and Stage 5 inter-project cumulative effects assessment conclusions reported in the Environmental Statement where additional significant effects are identified.
10.11 – 10.12	Tendring District Council	TDC's RR and indeed this LIR provide compelling evidence that BMV land in north-west Tendring is both rare and critically important. The combination of multiple NSIPs creates overlapping, extended construction footprints, compounding: • Land sterilisation • Soil degradation • Construction compaction • Fragmentation of viable agricultural units The ES treats agricultural cumulative effects narrowly, failing to characterise the magnitude of multi-project concurrent land loss.	6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] by competent and professional experts. The assessment presented in 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] relating to agricultural land, and in particular best and most versatile (BMV) land, states that inter-project effects would be significant. As such the effects are not under-represented for this topic and the importance of BMV land has been recognised.

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			The 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303] sets out the measures which will be implemented to effectively manage the soils which are disturbed and includes a requirement for a Soil Scientist role to ensure the good practice measures (which are based on published guidance) are fully implemented. These measures account for situations where soils may be stockpiled for a number of years and include reconditioning measures to reverse any compaction as a result of handling and stockpiling. The Outline Soil Resource Plan also includes a commitment to an aftercare period to ensure reinstated soils are returned to their previous condition. The permanent loss of land is fully assessed in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138], and confirms the total permanent loss of agricultural land is significant. In relation to agricultural landholdings, once construction is complete all land required temporarily will be returned to landowners and whilst there may be some restrictions to existing activities immediately over or adjacent to buried cables or under overhead lines these would be dealt with through compensation agreements (which lie outside of the Environmental Impact Assessment process).
10.13 – 10.15	Tendring District Council	Whilst Traffic and Transport impacts are covered in detail in section 19 below it requires specific attention here given its wide-ranging and interlinked nature in the context of assessing cumulative effects. The ES Chapter 17 recognises the potential for cumulative traffic impacts given shared infrastructure and	6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271] and 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] .

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		overlapping construction programmes, particularly between N2T, NF and FE. However, TDC finds that: • The cumulative traffic assessment is high-level and insufficient at Tendring district level – many aspects remain unresolved. • The sensitivity of narrow rural lanes in Ardleigh, Little Bromley and Lawford is not accounted for. • The EACN's remote rural siting (unlike an A12-adjacent alternative) forces large volumes of construction traffic into the least resilient road environments. • The ES assumes programme coordination between NSIPs, but does not secure it through binding commitments – therefore no weight can be given to these assumptions unless they are legally secured through binding commitments. TDC's RR and this LIR set out clear evidence that traffic-related cumulative harm will be among the most severe and longest-lasting impacts in the district.	Committed developments included within the traffic data which has informed the assessments within the Environmental Statement are provided in 6.16.A3 Environmental Statement Appendix 16.3 – Future Baseline [APP-274]. This has been developed through engagement with Local Highway Authorities. In 6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271], the committed developments combined with the Project flows contribute to the cumulative assessment for daily traffic increases against future baseline. Where required, mitigation measures (for example, road widening and shared pedestrian and cyclist facilities) have been provided and considered when assessing the cumulative impacts arising from both the Project and all other committed developments to avoid severe residual cumulative impacts. The Primary Access Routes have been assessed for two-way Heavy Goods Vehicle movements, and any additional mitigation is detailed within the 7.3 Outline Construction Traffic Management Plan - Appendix C - Indicative Highway Mitigation Plans [APP-312 – APP-320]. Programme coordination is not relied upon within the inter-project cumulative assessment. Instead, the assessment has been undertaken on the assumption that all applications submitted but not yet determined would have a temporal overlap with the Project. The Applicant has and will continue to engage with the promoters of North Falls and Five Estuaries Wind Farms on the design matters and use of haul roads. 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134] submitted at

ID	Stakeholder	Comment	NG response
			Deadline 1 details the approach taken by the Applicant to coordinate the Project with the other projects, including a summary log of discussions with the developers of the projects both pre-application and pre-examination.
10.16 – 10.18	Tendring District Council	ES Chapter 17 acknowledges that cumulative health impacts must be considered under NPS EN-1. TDC and ECC agree that: • Chronic stress, sleep disturbance, construction noise, vibration, and prolonged uncertainty will create compound socio-psychological harms. • These impacts disproportionately affect small rural settlements such as Ardleigh, Little Bromley and the dispersed hamlets between them. • NGET has not provided any holistic assessment of how multi-year, multi-project construction will affect mental health, social cohesion, access to services, and recreational assets. This omission is regarded as a major deficiency in the ES.	The Applicant disagrees there are major deficiencies in the Environmental Statement. 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has considered the impact of other construction projects on health and wellbeing, particularly as they relate to environmental change (including noise, air quality, landscape and visual effects and effects relating to Public Rights of Way (PRoWs)). Paragraph 17.5.47 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] states that, with the implementation of best practicable means (BPM) and other mitigation measures as part of other developments, there would be no adverse effects from environmental change in relation to these topics. In relation to PRoWs, appropriate PRoW management measures (for example diversion routes) would be implemented to minimise disruption to physical activity. It is noted that, in a number of instances, adverse effects on mental health and wellbeing may be particularly relevant as a result of the scale of other development (for example significant residential or infrastructure development) and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction phases.

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10.19 – 10.20	Tendring District Council	ECC’s position (RR October 2025) states that cumulative effects on designated assets—particularly setting change—are accepted for the N2T project taken in isolation but become more harmful in combination with other planned NSIPs. This is inadequate, as TDC’s RR and the relevant chapter (focussing on Heritage Assets in TDC – covered below) shows multiple heritage receptors near Ardleigh and Little Bromley will experience: • Large-scale industrialisation of their rural context • Visual coalescence of substations, pylons, haul roads and compounds • Multi-year construction activity creating harmful sensory effects	No significant cumulative effects were identified for any designated or non-designated heritage assets located within Tendring as set out in paragraphs 17.5.49 to 17.5.52 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]. In addition, Stage 5 of the cumulative assessment was undertaken for the historic environment, following the methodology set out in paragraph 17.5.22 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]. The Applicant considers the conclusions of the cumulative assessment for the historic environment to be appropriate.
10.23 - 10.24	Tendring District Council	The ES cumulative effects chapter relies on fixed spatial assumptions that are not secured. Any variation permitted by the DCO may: • Bring infrastructure closer to properties • Shift haul routes onto even more unsuitable lanes • Expand working widths • Increase vegetation loss • Alter drainage patterns NGET has not assessed how such flexibility interacts cumulatively with other NSIPs	Limits of Deviation are assessed within Section 17.6 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281].
10.25 – 10.26	Tendring District Council	Although the ES identifies several significant intra-project cumulative effects on PRow users, it concludes that no additional mitigation is required. TDC disagrees with this finding, including:	6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] by competent and professional experts.

ID	Stakeholder	Comment	NG response
		- Combined noise, visual, access and severance effects on PRoW networks in Ardleigh and Little Bromley will be highly disruptive, multi-year, and not easily mitigated. - The compounding of noise + traffic + dust + landscape harm for residents and businesses in north-west Tendring is far more severe than the ES suggests. - The ES “professional judgement” approach underestimates lived-experience harm across multiple receptor pathways.	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 5.6 Planning Statement [APP-085]. National Policy Statements 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.
10.27 – 10.28	Tendring District Council	TDC concludes that the current cumulative effects assessment: - Fails to recognise the extraordinary concentration of nationally significant energy infrastructure in the Tendring Peninsula. - Undervalues the sensitivity of rural communities, heritage landscapes, and BMV farmland. - Overstates the mitigating effect of programme coordination that is not secured. - Ignores or downplays cumulative effects that will be severe, long-term and irreversible. TDC therefore requests that the ExA require: 22. A revised cumulative effects assessment, integrating all NSIPs known to be functionally and spatially linked to N2T. 23. Legally binding coordination mechanisms across N2T, NF, FE, and TI, including aligned construction timetables and shared mitigation strategies.	6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] by competent and professional experts. 1. 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283] provides a list of all other development that met the criteria for inclusion within the inter-project cumulative effects assessment as of the 1 April 2025. 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 the Environmental Statement then these would be published into Examination as updates to the relevant inter-project cumulative effects documents (as appropriate).

ID	Stakeholder	Comment	NG response
		24. Full cumulative landscape and visual modelling covering the EACN cluster, windfarm substations, pylon corridor and cable corridors. 25. A cumulative agricultural land-take analysis, including soil degradation and long-term farm viability impacts. 26. A comprehensive rural transport cumulative assessment, with modelling of overlapping HGV schedules. 27. An accurate, realistic, properly informed and cumulative health and wellbeing assessment, as required by EN-1 and statutory guidance. 28. Secured, fully enforceable mitigation addressing cumulative impacts, not just impacts from N2T alone.	2. The Applicant does not consider it appropriate or necessary to have a legally binding commitment that binds the Project with Five Estuaries, North Falls and Tarchon Interconnector on construction timetables and shared mitigation strategies. These are separate schemes at different stages. The Applicant will, through existing measures in its own DCO documentation, ensure there is no conflict during construction activities. This will be developed further through continued co-operation/engagement. 3. 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] by competent and professional experts which includes an inter-project cumulative effects on landscape and visual receptors. 4. 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] by competent and professional experts which includes an inter-project cumulative effects on agriculture and soils receptors. 5. 6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271] provides an assessment which includes traffic generated from other committed developments. 6. As stated above, 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] and includes an appropriate

ID	Stakeholder	Comment	NG response
			assessment of inter-project cumulative effects on health and wellbeing. 7. The Applicant is only required to follow the mitigation hierarchy and develop mitigation related to impact generated by the Project. All proposed mitigation is secured though the Requirements within 3.1 Draft Development Consent Order [APP-056].
12.2	Tendring District Council	In terms of Highways & Construction Traffic Pressure, the ALBA faces severe risk from overlapping construction traffic associated with N2T and the offshore windfarm grid connections. ECC Place Services highlight that cumulative effects in Tendring are likely to be significant and adverse, yet NGET's Chapter 17: but provides no binding or enforceable mitigation.	Mitigation relating to highways and construction traffic is detailed within 7.3 Outline Construction Traffic Management Plan [APP-309] and secured within Requirement 4 of 3.1 Draft Development Consent Order [APP-056].
9.23	Colchester City Council	Cumulative negative effect on the physical and mental health of vulnerable residents (notably older people / those with limited mobility living in rural areas). Associated impact on widening existing health inequalities. The Council considers that the applicant has understated the impacts of the project on the health and wellbeing of the communities affected.	The Applicant disagrees that impacts of the Project on health and wellbeing have been understated. An assessment of cumulative effects is presented in 6.16 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]; paragraph 17.5.47 notes that in a number of instances, adverse effects on mental health and wellbeing may be particularly relevant as a result of the scale of other development (for example significant residential or infrastructure development) and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction phases.
9.35	Colchester City Council	The Overarching National Policy Statement for Energy (EN-1) requires Environmental Statements to identify and mitigate adverse health impacts, including	An assessment of cumulative effects is presented in 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]. The assessment has

ID	Stakeholder	Comment	NG response
		cumulative effects and impacts on vulnerable groups. The Health and Wellbeing chapter does not provide any view on cumulative health effects as required under EN-1. The Council considers that the ES does not yet meet these expectations and requires further work to ensure compliance.	been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] by competent and professional experts and includes an inter-project cumulative effects section on health and wellbeing as required under National Policy Statement EN-1 (2024).
9.39	Colchester City Council	EN-1 paragraph 4.4.5 requires consideration of cumulative impacts where multiple developments may affect people simultaneously. Colchester communities may experience compounded psychological stress from overlapping NSIPs and growth schemes. Mental Wellbeing Impact Assessment (MWIA) workshops, recommended at PEIR stage, were not undertaken. The Council advises revisiting this through targeted community engagement to ensure cumulative mental health impacts are adequately evaluated.	The findings from a cumulative assessment of Project impacts, including assessment of inter- and intra-project effects are presented in 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]. As stated above, paragraph 17.5.47 of Chapter 17 highlights that, in a number of instances, adverse effects on mental health and wellbeing may be particularly relevant as a result of the scale of other development. While Mental Wellbeing Impact Assessment workshops were not undertaken following the Preliminary Environmental Information Report (PEIR) stage (statutory consultation) of the Project, the health and wellbeing assessment presented in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] covers potential impacts on both physical and mental health and wellbeing, and includes many of the concerns and anxieties raised by residents and stakeholders during statutory and non-statutory consultation. Measures to address these concerns and anxieties have been incorporated into the health and wellbeing assessment, and include communication and information sharing during the construction phase as well as identifying opportunities for public awareness raising for affected communities along the Project.

ID	Stakeholder	Comment	NG response
12.145	Colchester City Council	Paragraph 17.4.18 identifies that ‘No effects on common receptors during the operation (and maintenance) phase of the Project have been identified which could give rise to intra-project cumulative effects and are therefore not considered further.’ We query this in relation to Agricultural and soil receptors, Landscape, Ecology and Historic receptors.	No common receptors were identified during operation (and maintenance), therefore there is no potential for intra-project cumulative effects. Intra-project effects are intrinsic in the assessment presented within 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] , 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] , 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068] . There were no effects identified on the same receptor in any other environmental topic chapter of the Environmental Statement for these receptors.
14.30	Colchester City Council	Adequacy of the application/DCO <i>The cumulative impact of significant construction/infrastructure projects in the county requires consideration. This includes 12 NSIPs, four new Garden Communities and two Freeports in Essex. Consideration should include the timing/phasing of the projects and inter-project impacts – including the transportation of construction materials and availability of labour. This should be considered as part of the ‘future baseline’ scenario.</i>	Inter-project cumulative effects from other development are assessed within 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] and not considered as part of the ‘future baseline’ scenario. 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken on the assumption that all applications submitted but not yet determined would have a temporal overlap with the Project – including for example availability of labour.
16.9	Colchester City Council	Additionally, alongside this nationally significant infrastructure project, there are others taking place in the East of England which together will exacerbate	6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283] provides a list of all other development that

ID	Stakeholder	Comment	NG response
		impacts on many factors including landscape and visual impacts, economic impacts, traffic congestion and more. Consideration should be given to the timing of the projects and how interactions of impacts can be minimised through effective co-ordination of project stages.	met the criteria for inclusion within the inter-project cumulative effects assessment as of the 1 April 2025. 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).
16.10	Colchester City Council	The Council also notes that the applicant identifies several intra-project impacts between different receptors including Land and Community Assets, Development Land and Businesses, and Pedestrians, Cyclists and Horse Riders and these only at Construction Stage. We are concerned that no intra-project cumulative effects are identified at the Construction and Operational Stage for Agricultural and Soil, Landscape, Ecology and Historic receptors.	Table A17.1.1 in 6.17.A1 Environmental Statement Appendix 17.1 – Intra-Project Cumulative Effects [APP-282] states: • Agriculture and soil – ‘<i>Intra-project effects are intrinsic in the assessment presented in [6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]].</i>’ • Landscape – ‘<i>Intra-project effects are intrinsic in the assessment presented in [6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]].</i>’ for a number of aspects • Ecology – ‘<i>Intra-project effects are intrinsic in the assessment presented in [6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]].</i>’ • Historic receptors – ‘<i>Intra-project effects are intrinsic in the assessment presented in [6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]].</i>’

ID	Stakeholder	Comment	NG response
			Detail is also provided as to why intra-project cumulative effects are intrinsic in the assessments. Therefore, the Applicant can confirm that intra-project cumulative effects are identified at the construction and operation (and maintenance) stage for agricultural and soil, landscape, ecology and historic receptors and are considered within the Environmental Statement.
15.3.2 – 15.3.4	Braintree District Council	Within Braintree District, this NSIP would overlap or intersect with several projects at either the construction and/or operational stage. These include major projects such as the Bramford to Twinstead NSIP (PINS reference EN020002) (construction phase), the existing Pelham to Rayleigh 400 kV overhead line (operational phase), the Rivenhall Incinerator (PINS reference EN010013) (construction and operational phases) (Figure A in Appendix 2), and a draft allocation of approximately 5,000 dwellings to the north of Kelvedon, known locally as Kings Dean (Figure B in Appendix 2). For Kings Dean, the proposed line would pass through the northern part of the allocation. It would also directly interact/intersect with other projects including: • <i>The approved solar farm at Land East of Littlebury Coggeshall Road Feering (construction and operational phase) (figure C in Appendix 2)</i> • <i>The proposed up-to 600 dwelling parker land development at Land South West of Coggeshall Road Kelvedon (construction and operational phase [if granted planning permission – essentially</i>	The consultation on Braintree’s Local Plan began in March 2026. The Project has been made aware of the draft allocation for approximately 5,000 dwellings to the north of Kelvedon. A small phase of that allocation was considered and reported in 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283] (see ID B13). The Project will consider this larger draft allocation in future revisions of the cumulative effects assessment (post-April 2025 list) to be undertaken during Examination and will report any changes in conclusions to the Environmental Statement if appropriate. All other developments listed in Section 15 of Braintree District Council LIR [REP1-148] have been considered within the long list of other existing and/or approved developments that informed the cumulative effects assessment (6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]).

ID	Stakeholder	Comment	NG response
		<i>phase 1 of draft allocation for 5000 homes] (figure B in Appendix 2)</i> • <i>Bradwell Quarry (construction and operational phase), (figure D in Appendix 2)</i> • <i>The approved solar development at Land West of Park Road Rivenhall, (figure E in Appendix 2)</i> • <i>Cressing Farm equestrian facilities, (figure F in Appendix 2)</i> • <i>The recently consented solar farm at Land South West of Cressing Temple Witham Road Cressing (construction and operational phase) (figure G in Appendix 2)</i> Finally, the project boundaries would go close to the consented DCO scheme known as “Longfield” (PINS reference EN010118) which is in the construction phase.	
15.4.6	Braintree District Council	In relation to socio-economics, recreation and tourism, the Environmental Statement (APP-281) concludes that cumulative effects on skills, employment and tourism would be negligible and not significant. While the Council defers to Essex County Council on detailed labour market impacts, it considers that the concentration of major projects across the East of England is likely to place significant pressure on the labour force, with a substantial proportion of workers likely to be drawn from outside the local area. The Council therefore does not agree with the ES conclusion that cumulative labour impacts would be insignificant.	Please see the above response (ID.10.3 and 10.66) in relation to the anticipated scale of construction employment generation.

ID	Stakeholder	Comment	NG response
18.2.37 – 18.2.38	Braintree District Council	Under-assessment of cumulative impacts, particularly in relation to landscape, archaeology, agricultural land and construction disturbance. Failure to adequately consider combined effects with Bramford to Twinstead, existing transmission infrastructure and other major developments within the District.	6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] by competent and professional experts. 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283] provides a list of all other development that met the criteria for inclusion within the inter-project cumulative effects assessment as of the 1 April 2025 – which includes Bramford to Twinstead and other major developments in the district. 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). Existing infrastructure is part of the baseline and considered within the environmental topic chapters in the Environmental Statement (Volume 6 of the application for development consent).
8.545	Chelmsford City Council	Significant cumulative effects at the construction stage are identified on Pedestrians, Cyclists and Horse Riders in many Visual Receptor Areas (VRAs) and yet paragraph 17.4.21 identifies ‘... no additional mitigation measures were identified in addition to those	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 5.6 Planning Statement [APP-085]. National Policy Statements EN-1 (2024) and EN-5 (2024) do not state

ID	Stakeholder	Comment	NG response
		already identified within the environmental topic assessments' (Our underlining). The decision-making assumptions that gave rise to these conclusions need clarifying.	that all residual effects must be compensated for or that any compensation measure proposed must be accepted if there are residual effects.
8.546	Chelmsford City Council	Paragraph 17.4.18 identifies that 'No effects on common receptors during the operation (and maintenance) phase of the Project have been identified which could give rise to intra-Project cumulative effects and are therefore not considered further.' This is queried in relation to Agricultural and soil receptors, Landscape, Ecology and Historic receptors.	No common receptors were identified during operation (and maintenance), therefore there is no potential for intra-project cumulative effects. Intra-project effects are intrinsic in the assessment presented within 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] , 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] , 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068] . There were no effects identified on the same receptor in any other environmental topic chapter of the Environmental Statement for these receptors.
8.548	Chelmsford City Council	Cumulative effects of the development are split by the application into two categories: intra-Project and inter-Project. Archaeological remains are not considered potential receptors to give rise to intra-Project cumulative effects.	Potential for intra-project cumulative effects was considered for all heritage assets, including archaeology, as set out in Table A17.1.1 of 6.17.A1 Environmental Statement Appendix 17.1 - Intra-Project Cumulative Effects [APP-282] .
8.550 – 8.553	Chelmsford City Council	No significant inter-Project cumulative effects have been identified for archaeological remains as part of the assessment. The reasoning for this is expanded in Section 17.5.52 (APP-281) which states: "While there would be overlap of the Order Limits for other developments and the Project, effects to archaeology would only occur once by whichever construction would take place first. These effects would be mitigated as appropriate and agreed with the LPA	6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] . The assessment of cumulative effects on archaeological remains considered whether the archaeological remains affected by the Project were likely to extend significantly into the area affected by the other development. On the basis of current

ID	Stakeholder	Comment	NG response
		(such as through excavation, recording, and publication). Any affected archaeology would be removed as a result of the mitigation/construction and therefore the inter-Project effects for construction and operation (and maintenance) would be negligible and not significant.” This statement is incorrect as the cumulative effects would be derived from the increase in land take across the combined Order Limits of both or more Projects and not from overlap. For example, in Tendring District a separate substation is planned to be erected adjacent to the substations required for both Five Estuaries and North Falls Offshore Windfarms and not within the same parcels of land. Similarly, the Lower Thames Crossing within Thurrock District will result in a significant impact on archaeological remains that would be increased by the groundworks required for the construction of a substation for Norwich to Tilbury as well as pylon bases and associated infrastructure. The cumulative impact of the Project would be because of the increase in the total area of land take and not overlap, and therefore the scale of potential archaeological remains which could be lost as a result of the mitigation / construction is increased. Archaeological remains are a finite and non-renewable resource. This cumulative impact may not be determined as significant through the process of the assessment but should be considered an adverse effect of the Project wherever they are removed. As the nature of the archaeological remains that may be affected is currently unknown the impact and	information this was not expected to be significant and therefore the cumulative assessment concluded negligible and not significant effects for the construction phase (see 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]). Effects on archaeology more broadly i.e. the cumulative effect on archaeology within an area from multiple developments was not assessed as it would be difficult to define a study area / zone of influence that sensibly reflects the scale of the archaeological sites and in addition, each development would implement its own mitigation.

ID	Stakeholder	Comment	NG response
		significance cannot be determined effectively through this form of assessment. While mitigation by record may reduce the cumulative impact in EIA terms, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted (NPPF, 2004 Paragraph 218).	
11.51 – 11.52	Chelmsford City Council	The Project has potential to give rise to intra-Project cumulative effects, and these will need to be considered for all receptors, especially with regard to agriculture and soil, ecology and historic receptors which have not been considered further. Other receptors include ecology, highways, landscape and visual and noise. There is particular concern regarding the cumulative noise and construction impacts arising from these developments. Cumulatively taken all together the Project has potential to lead to significant adverse effects. It is crucial that residents get regular breaks, and the proposed development is well managed, controlled and integrated within existing permitted development schemes. Reasonable hours of work and good construction traffic management are one of the key measures to reduce impact.	Intra-project cumulative effects occur when a resource, receptor or group of receptors are potentially affected by more than one source of direct environmental impact resulting from the same development⁹¹. For example, a community may be affected by both noise and dust effects resulting from the construction phase activities of a single development. Table A17.1.1 in 6.17.A1 Environmental Statement Appendix 17.1 – Intra-Project Cumulative Effects [APP-282] states: • Agriculture and Soil – ‘<i>Intra-project effects are intrinsic in the assessment presented in [6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]].</i>’ • Landscape – ‘<i>Intra-project effects are intrinsic in the assessment presented in [6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]].</i>’ for a number of aspects • Ecology – ‘<i>Intra-project effects are intrinsic in the assessment presented in [6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]].</i>’ • Historic receptors – ‘<i>Intra-project effects are intrinsic in the assessment presented in [6.11</i>

⁹¹ Institute of Environmental Management and Assessment (2011) *Special Report – The State of Environmental Impact Assessment Practice in the UK*

ID	Stakeholder	Comment	NG response
			Environmental Statement Chapter 11- Historic Environment [AS-068]]’. Detail is also provided as to why intra-project cumulative effects are intrinsic in the assessments. Therefore, the Applicant can confirm that intra-project cumulative effects are identified at the construction and operation (and maintenance) stage for agricultural and soil, landscape, ecology and historic receptors and are considered within the Environmental Statement. 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] concludes that with the implementation of best practicable means (BPM) and other mitigation measures as part of other developments there would be no significant adverse effects on noise.

4.16 Other Matters

Local Authority Positions

- 4.16.1 New matters or those requiring clarification within the Local Impact Reports that are not covered within the other sections contained in this report are provided in the table below.

Responses to New Matters and Applicant Clarifications

- 4.16.2 The table below sets out the Applicant's response to the matters raised in the Local Impact Reports that the Applicant previously has not addressed in their documents, including Statements of Common Ground with Local Authorities or in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**.

Table 4.29 Other Matters – Responses to New Matters and Applicant Clarifications

ID	Stakeholder	Comment	NG response
6.17.1	Thurrock Council	Summary: The Council does not consider that the Applicant has met the necessary tests for the compulsory acquisition of land which hosts the Linford HWRC. Specifically, the Applicant has not demonstrated that the land is required for the development, nor is it in the public interest for rights in this land to be compulsorily acquired. Finally, the Applicant has not adequately sought to acquire land by agreement in the first instance, using compulsory acquisition powers as a last resort. Acquisition of the land has the potential to negatively impact residents' use of the site, restricting the Council's ability to fulfil its statutory duties as a waste collection authority and potentially causing traffic issues on Buckingham Hill Road. (Detailed comments provided in paragraphs 6.17.3 to 6.17.22)	The Applicant does not agree with the Council's position that the statutory tests for compulsory acquisition under section 122 of the Planning Act 2008 have not been met in relation to land at Linford Household Waste and Recycling Centre (HWRC). The Application seeks temporary and permanent rights only, rather than acquisition of the freehold, and these rights are limited in extent and purpose. They are required to facilitate the construction, operation and maintenance of the overhead electricity line between pylons TB256 and TB259 and associated access and therefore fall within section 122(2)(a) and (b) of the 2008 Act. The rights sought are necessary to ensure the safe construction and long-term operation of nationally significant electricity infrastructure and cannot reasonably be omitted without compromising deliverability of the scheme. In accordance with section 122(3), the Applicant considers there to be a compelling case in the public interest for the acquisition of these rights. The Scheme forms part of strategic national electricity transmission infrastructure required to maintain security of supply and enable the connection of low-carbon generation. The rights sought at Linford HWRC are proportionate,

ID	Stakeholder	Comment	NG response
			limited to what is required, and subject to compensation in accordance with the statutory compensation code. The Applicant does not accept that it has failed to pursue acquisition by agreement. Engagement with the Council commenced in late 2024 in respect of land and access at Linford HWRC, and the Applicant remains willing to continue discussions with the Council to seek voluntary agreement. The inclusion of land within the Order Limits reflects the need to ensure the Scheme can be delivered should voluntary agreement not be reached, consistent with established DCO practice and the Guidance. The Applicant proposes to arrange a site meeting involving representatives from both the Council and Linford Household Waste and Recycling Centre (HWRC). The purpose of this meeting is to facilitate further discussion of the issues that have been raised regarding the proposed Scheme. By convening at the site, all parties will have the opportunity to look at the affected areas in detail and to consider appropriate mitigation measures tailored to the specific circumstances of Linford HWRC. This collaborative approach aims to ensure that concerns are addressed directly and that solutions are developed through joint engagement. The Applicant is committed to working with all relevant stakeholders to identify and implement site-specific mitigation, thereby promoting the effective delivery of the Scheme while minimising disruption and ensuring continued operation of the HWRC.

Appendix A.

Tables Evidencing the Applicant's Regard to each Local Impact Report

Appendix A

Tables Evidencing the Applicant's Regard to each Local Impact Report

A.1 Norfolk County Council

Table A.1 The Applicant's Regard to Norfolk County Council's Local Impact Report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
Section 1: Contents	N/A – no response required, introductory content
Section 2: Index of tables	N/A – no response required, introductory content
Section 3: Introduction	N/A – no response required, introductory content
Section 4: Executive Summary	Matters raised in Section 4, aside from those referenced below, have previously been responded to within the Environmental Statement [APP-123] – [APP-298], within the Statement of Common Ground with Norfolk County Council [REP1-010] or within Table W1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	4.2 Response provided in the Landscape and Visual-Landscape Compensation section of this report
	4.3 Response provided in the Traffic and Transport section of this report
	4.4 Response provided in the Safety and Security- Airfields section of this report
Section 5: Purpose and Structure of Report	N/A – no response required, introductory content
Section 6: Ecology and Biodiversity	Matters raised in Section 6, aside from those referenced below, have previously been responded to within Environmental Statement Chapter 8- Ecology and Biodiversity [APP-158], within Section 3.3 Ecology and Biodiversity of the Statement of Common Ground with Norfolk County Council [REP1-010] or within Table W1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	6.4 Response provided in the Landscape and Visual-Landscape Compensation section of this report, the Biodiversity, Ecology and Nature Conservation- Replacement Tree Planting section of this report and the Biodiversity, Ecology and Nature Conservation- Biodiversity Net Gain section of this report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	6.22 Response provided in the Landscape and Visual-Landscape Compensation section of this report and the Biodiversity, Ecology and Nature Conservation- Replacement Tree Planting section of this report
	6.24 Response provided in the Biodiversity Ecology and Nature Conservation (Ecology and Biodiversity) section of this report
	6.25 Response provided in the Landscape and Visual-Landscape Compensation section of this report, the Biodiversity, Ecology and Nature Conservation- Replacement Tree Planting section of this report and the Biodiversity, Ecology and Nature Conservation- Biodiversity Net Gain section of this report
	6.26 Response provided in the Biodiversity, Ecology and Nature Conservation- Biodiversity Net Gain section of this report
Section 7: Contaminated Land, Geology and Hydrogeology	Matters raised in Section 7 have previously been responded to within Environmental Statement Chapter 9- Contaminated Land Geology and Hydrogeology [APP-181], within Section 3.4 Ecology and Biodiversity of the Statement of Common Ground with Norfolk County Council [REP1-010] or within Table W1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
Section 8: Health and Wellbeing	Matters raised in Section 8 have previously been responded to within Environmental Statement Chapter 10- Health and Wellbeing [APP-192], within Section 3.5 Health and Wellbeing of the Statement of Common Ground with Norfolk County Council [REP1-010] or within Table W1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
Section 9: Historic Environment	Matters raised in Section 9 have previously been responded to within Environmental Statement Chapter 11- Historic Environment [AS-068], within Section 3.6 Historic Environment of the Statement of Common Ground with Norfolk County Council [REP1-010] or within Table W1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
Section 10: Hydrology, land drainage and flood risk	Matters raised in Section 10 have previously been responded to within Environmental Statement Chapter 9- Contaminated Land Geology and Hydrogeology [APP-181], within Section 3.7 Hydrology, Land Drainage and Flood Risk of the Statement of Common Ground with Norfolk County Council [REP1-010] or within Table W1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	10.5 Response provided in the Planning Policy section of this report
	10.8 - 10.16 Response provided in the Water and Environment (Hydrology, Land Drainage and Flood Risk) section of this report
Section 11: Landscape and Visual	Matters raised in Section 11 have previously been responded to within Environmental Statement Chapter 13- Landscape and Visual [APP-266], within Section 3.8 Landscape and Visual of the Statement of Common Ground with Norfolk County Council [REP1-010] or within Table W1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	11.2 Response Provided in the Alternatives- Waveney Valley chapter and the Landscape and Visual-Landscape Compensation section of this report
	11.3 Response provided in the Landscape and Visual-Landscape Compensation section of this report
	11.4 Response provided in the Biodiversity, Ecology and Nature Conservation- Biodiversity Net Gain section of this report
	11.6 Response provided in the Landscape and Visual-Landscape Compensation section of this report
	11.12 Response provided in the Landscape and Visual section of this report
	11.15 Response provided in the Landscape and Visual section of this report
	11.22 Response provided in the Landscape and Visual section of this report
	11.23 Response provided in the Biodiversity, Ecology and Nature Conservation- Replacement Tree Planting section of this report
	11.24 Response Provided in the Alternatives- Waveney Valley chapter and the Alternatives-Technology Choice-Overhead Line and Underground Cables section of this report
	11.25 Response provided in the Alternatives-Technology Choice-Overhead Line and Underground Cables section of this report
	11.27 – 11.28 Response provided in the Alternatives-Technology Choice-Overhead Line and Underground Cables section of this report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	11.30 Response Provided in the Alternatives- Waveney Valley chapter and the Alternatives-Technology Choice-Overhead Line and Underground Cables section of this report
	11.31 – 11.32 Response provided in the Landscape and Visual-Landscape Compensation section of this report
Section 12: Socio-economics, Recreation and Tourism	Matters raised in Section 12 have previously been responded to within Environmental Statement Chapter 15- Socio-economics, Recreation and Tourism [APP-265], within Section 3.9 Socio-economics, Recreation and Tourism of the Statement of Common Ground with Norfolk County Council [REP1-010] or within Table W1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	12.1 – 12.2 Response provided in the Safety and Security- Airfields section of this report
	12.4 – 12.5 Response provided in the Safety and Security- Airfields section of this report
	12.6 Response provided in the Socio-economics, Recreation and Tourism chapter and the Safety and Security- Airfields section of this report
	12.8 Response provided in the Safety and Security- Airfields section of this report
Section 13: Traffic and Transport	Matters raised in Section 13 have previously been responded to within Environmental Statement Chapter 16- Traffic and Transport [APP-271], within Section 3.10- Traffic and Transport of the Statement of Common Ground with Norfolk County Council [REP1-010] or within Table W1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	13.1 Response provided in the Traffic and Transport section of this report
	13.3 – 13.4 Response provided in the Traffic and Transport section of this report
	13.6 Response provided in the Traffic and Transport section of this report
	13.9 – 13.12 Response provided in the Traffic and Transport section of this report
	13.16 Response provided in the Traffic and Transport section of this report
Appendix A: Requested changes to Draft DCO	Response provided in Draft Development Consent Order, Requirements and Management Plans section of this report

A.2 Suffolk County Council, Babergh District Council and Mid Suffolk District Council

Table A.2 The Applicant's Regard to the Suffolk County Council / Babergh District Council / Mid Suffolk District Council Local Impact Report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
List of Tables	N/A – no response required, introductory content
Glossary of Acronyms	N/A – no response required, introductory content
Purpose of this Submission	N/A – no response required, introductory content
Annexes	Responses to the content of the annexes have been provided within the relevant topics in Chapters 3 and 4 as appropriate and noted below
Appendices	Contains policies, strategies and reference documents – references to the content of the these have been provided within the relevant topics in Chapters 3 and 4 as appropriate
Overview	
1 Introduction	Introductory content and previously stated position statements, including summarising detailed points made under the relevant topics 1.7 - Response provided within Chapter 3: Needs Case and Timing, Alternatives - Offshore Alternatives, and Alternatives - Technology Choice – Overhead Line and Underground Cables
2 Terms of Reference	N/A – no response required, introductory content
3 Description of the Area	N/A – no response required, introductory content
4 Policy Context	4.1 – Response provided in Chapter 4: Planning Policy 4.7 - Response provided in Chapter 3: Alternatives - Technology Choice – Overhead Line and Underground Cables 4.10 - Response provided within Chapter 3: Environmental Impact Assessment - General 4.19-4.21 - Response provided in the Socio-economics, Recreation and Tourism – Community Benefits section of this report in Chapter 3
Impacts by Issue	
5 Agriculture, Soils and Geology	Matters raised in Section 5 have previously been responded to within Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] or within Table C1.1 (Babergh District Council and Mid Suffolk District Council) of 8.4.1 Applicant's response to Relevant Representations [REP1-132].

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
6 Airfield Safeguarding	Matters raised in Section 6 have previously been responded to within Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267] or within Table AB1.1 (Suffolk County Council) of 8.4.1 Applicant's response to Relevant Representations [REP1-132]. 6.1-6.33, Appendices 24, 25 and 26 – Response provided in the Safety and Security - Airfields section of this report
7 Archaeology and 8 Built Heritage	Matters raised in Sections 7 and 8, aside from those referenced below, have previously been responded to within Environmental Statement Chapter 11 - Historic Environment [APP208 and AS-068], within Sections 3.7 Historic Environment of the Statements of Common Ground with Suffolk County Council [REP1-012] and Babergh District Council and Mid Suffolk District Council [REP1-020] or within Tables AB1.1 (Suffolk County Council) and C1.1 (Babergh District Council and Mid Suffolk District Council) of 8.4.1 Applicant's response to Relevant Representations [REP1-132]. 7.28, 7.38, 7.42, 7.47, 7.67, 8.37 – 8.39, 8.54, 8.55, Annex A Table 1: 1.1, Annex A Table 2: 2.1, 2.6, 2.7, Annex A Table 3: 3.1, 3.2, 3.5, 3.7-3.9, 3.11, 3.12, 3.14, 3.16, 3.18 – 3.23, 3.25, 3.26. Annex A Table 4: 4.2, 4.4, 4.6, Annex A Table 5: 5.1, 5.2, 5.4, 5.6, Annex A Table 6: 6.1 – 6.3, Annex A Table 7: 7.1, 7.3, 7.4, 7.6, 7.9, Annex A Table 8: 8.2, 8.4-8.6, Annex A Table 9: 9.6, 9.8, 9.9 - Response provided within the Historic Environment section of Chapter 4
9 Ecology	Matters raised in Section 9, aside from those referenced below, have previously been responded to within Environmental Statement Chapter 8 - Ecology and Biodiversity [APP-158], within Sections 3.3 Ecology and Biodiversity of the Statements of Common Ground with Suffolk County Council [REP1-012] and Babergh District Council and Mid Suffolk District Council [REP1-020] or within Tables AB1.1 (Suffolk County Council) and C1.1 (Babergh District Council and Mid Suffolk District Council) of 8.4.1 Applicant's response to Relevant Representations [REP1-132]. 9.2, 9.5, 9.9, 9.10, 9.34, 9.35, 9.42, 9.46, 9.55, 9.59 - Response provided within Chapter 4: Biodiversity, Ecology and Nature Conservation (Ecology and Biodiversity) 9.6, 9.7, 9.41, 9.43, 9.47, 9.58 - Response provided within Chapter 4: Biodiversity, Ecology and Nature Conservation (Ecology and Biodiversity) 9.63 - Response provided within Chapter 4: Environmental Impact Assessment - General

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
10 Economy, Skills and Tourism	Matters raised in Section 10, aside from those referenced below, have previously been responded to within Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] and Chapter 17 – Cumulative Effects [APP-281] , within Section 3.9 Socio-economics, Recreation and Tourism of the Statement of Common Ground with Suffolk County Council [REP1-012] and Babergh District Council and Mid Suffolk District Council [REP1-020] or within Tables AB1.1 (Suffolk County Council) and C1.1 (Babergh District Council and Mid Suffolk District Council) of 8.4.1 Applicant's response to Relevant Representations [REP1-132] .
	10.3, 10.66, 10.73, 10.74 - Response provided within Chapter 4: Cumulative Effects
	10.6 - Response provided within Chapter 4: Socio-economics, Recreation and Tourism
11 Flood and Water Environment	Matters raised in Section 11 have previously been responded to within Environmental Statement Chapter 12 – Hydrology, Land Drainage and Flood Risk [APP-221] , within Section 3.7 Hydrology, Land Drainage and Flood Risk of the Statement of Common Ground with Suffolk County Council [REP1-012] or within Tables AB1.1 (Suffolk County Council) and C1.1 (Babergh District Council and Mid Suffolk District Council) of 8.4.1 Applicant's response to Relevant Representations [REP1-132] .
	11.38 – 11.40, 11.43, 11.45, 11.51 - 11.57, Table 9 - Response provided within Chapter 4: Water Environment (Hydrology, Land Drainage and Flood Risk)
12 Highways	Matters raised in Section 12, aside from those referenced below, have previously been responded to within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and Chapter 17 – Cumulative Effects [APP-281] , within Section 3.10 Traffic and Transport of the Statement of Common Ground with Suffolk County Council [REP1-012] or within Tables AB1.1 (Suffolk County Council) and C1.1 (Babergh District Council and Mid Suffolk District Council) of 8.4.1 Applicant's response to Relevant Representations [REP1-132] .
	12.73-12.74 – Response provided within Chapter 4: Air Quality and Emissions (Air Quality)
	Table 10 Item 10a – 10g, 12.87 – 12.132, 12.136 – 12.141, 12.143, 12.147 – 12.151, 12.153, 12.154, 12.156, 12.157, 12.159, 12.162, 12.171, 12.178, 12.181, 12.185, 12.187,

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	12.188, 12.191, 12.192 – Responses provided within Chapter 4: Traffic and Transport
	12.170 - Response provided within Chapter 4: Cumulative Effects
13 Landscape and Visual	Matters raised in Section 13, aside from those referenced below, have previously been responded to within 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], Section 3.8 Landscape and Visual of the Statements of Common Ground with Suffolk County Council [REP1-012] and Babergh District Council and Mid Suffolk District Council [REP1-020] or within Tables AB1.1 (Suffolk County Council) and C1.1 (Babergh District Council and Mid Suffolk District Council) of 8.4.1 Applicant's response to Relevant Representations [REP1-132]. 13.3, 13.6, 13.27, 13.46, 13.159, 13.219, 13.222-13.229, Annex B – Responses provided within Chapter 3: Landscape and Visual - Landscape Compensation 13.6-13.7 - Response provided within Chapter 3: Alternatives - Waveney Valley 13.32 - Response provided within Chapter 3: Good Design 13.133, 13.178, 13.172, 13.221, 13.227, 3.228, 13.229 - Response provided within Chapter 3: Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting 13.155, 13.157 - Response provided within Chapter 4: Cumulative Effects 3.166, 13.186, 13.187, 3.16, 13.93, 13.99, 13.100, 13.105, 13.108, 13.114, 13.115, 13.118, 13.148, 13.150-13.154, 13.189, 13.190, 13.194-13.197 - Response provided within Chapter 4: Landscape and Visual 13.230 - Response provided within Chapter 3: Landscape and Visual - Furthering the Purposes of the National Landscape Annex B, 1.10, Annex C: 1.1, 1.3, 1.4 – 1.10, 1.12, 1.14 – 1.17, 1.19, 1.20, 1.22, 1.24, 1.29, 1.30 - 1.32, 1.35, 1.38, 1.40, 1.41, 1.45, 1.47, 1.50, 1.51, 1.54, 1.56, 1.58, 1.61, 1.66, 1.71, 1.73, 1.74, 1.76, 1.80, 1.83, 1.87, 1.88, 1.90, 1.91, 1.93, 1.96, 1.97, 1.100 - Response provided within Chapter 4: Landscape and Visual
14 Legal	Response provided within the Draft Development Consent Order, Requirements and Management Plans section of this report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
15 Minerals and Waste	Matters raised in Section 15 have previously been responded to within 6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181], or Section 3.4 Contaminated Land, Geology and Hydrogeology of the Statement of Common Ground with Suffolk County Council [REP1-012] or within Table AB1.1 (Suffolk County Council) of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	15.4 – Response provided within Chapter 4: Contaminated Land, Geology and Hydrogeology
16 Noise and Vibration	Matters raised in Section 16 have been responded to within Environmental Statement Chapter 14 Noise and Vibration [APP-256], within sections 3.5 of the Statements of Common Ground with Suffolk County Council [REP1-012] and Babergh District Council and Mid Suffolk District Council [REP1-020] or within Tables AB1.1 (Suffolk County Council) and C1.1 (Babergh District Council and Mid Suffolk District Council) of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
17 Public Health	Matters raised in Section 17 have previously been responded to within Environmental Statement Chapter 10 - Health and Wellbeing [APP-192], Chapter 7 – Air Quality [APP-147] within sections 3.5 of the Statements of Common Ground with Suffolk County Council [REP1-012] and Babergh District Council and Mid Suffolk District Council [REP1-020] or within Tables AB1.1 (Suffolk County Council) and C1.1 (Babergh District Council and Mid Suffolk District Council) of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	17.3, 17.47, 17.54, 17.56, 17.57, 17.81 - Response provided within Chapter 4: Cumulative Effects
	Table 14: 14e, 14i, 14o, paragraphs 17.43, 17.68, 17.73, 17.96 - Response provided within Chapter 4: Air Quality and Emissions (Air Quality)
	17.50, 17.51, 17.80, 17.85 - Response provided within Chapter 4: Health and Wellbeing
18 Public Rights of Way	Matters raised in Section 15, aside from those referenced below, have previously been responded to within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271], within Section 3.10 Traffic and Transport of the Statement of Common Ground with Suffolk County Council [REP1-012] or within Tables AB1.1 (Suffolk County Council) and C1.1 (Babergh District Council and Mid Suffolk District Council) of 8.4.1 Applicant's response to Relevant Representations [REP1-132].

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	18.4, 18.7, 18.9, Table 15 Item 15b – 15g, Table 15 item 15j, Table 15 item 15l – 15q, 18.32, 18.33, 18.35, 18.43, 18.45, 18.46) – Responses provided within Chapter 4: Traffic and Transport

A.3 Essex County Council

Table A.3 The Applicant's Regard to Essex County Council's Local Impact Report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
1. Terms of Reference - 1.1. Introduction & 1.2. Scope of Project & 1.4. Structure of LIR	N/A – no response required, introductory content
1. Terms of Reference – 1.3. Engagement with the Applicant	Response provided in Chapter 1 of this report
2 Description of the Area – 2.1 – 2.5.5	N/A – no response required, introductory content
2 Description of the Area – 2.5.6 – 2.5.8	Matters raised in the rest of Section 2, aside from those referenced below, are introductory or have previously been responded to within the Statement of Common Ground with Essex County Council [REP1-014] or within Table O1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	2.5.11 – Response provided in Cumulative Effects section of this report
	2.5.12 – Response provided in Socio-economics, Recreation and Tourism - Employment, Skills, Training and Local Supply Chain section of this report
	2.5.20, 2.5.23 – Response provided in Health and Wellbeing section of this report
	2.5.40 – Response provided Landscape and Visual - Landscape Compensation and Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting section of this report
2 Description of the Area – 2.6	N/A – no response required, context setting
3 Policy Context	Policy context has been considered through 5.6 Planning Statement [APP-085] and 5.7 Policy Compliance Document [APP-086], and 8.4.2 Policy Compliance Tracker [REP1-133]
	3.6.1 - 3.6.4 – Response provided in Socio-economics, Recreation and Tourism - Community Benefits section of this report
4 Assessment of Impacts (4.1)	N/A – no response required, introductory paragraph
4.2 In Principle Strategic Objection	Response provided in the following sections of this report: Needs Case and Timing Alternatives - Offshore Alternatives

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	Alternatives - Technology Choice – Overhead Line and Underground Cables Socio-economics, Recreation and Tourism - Community Benefits
4.3 Dunton Hills Garden Village	Response provided in Alternatives - Dunton Hills Garden Village section of this report, noting also the following paragraphs below covered in other sections of this report
	4.3.42, 4.3.44 – Response provided in Historic Environment section of this report
	4.3.46 – 4.3.47 – Response provided in Socio-economics, Recreation and Tourism section of this report
4.4 In Combination Effects / Cumulative Effects	Matters raised in Section 4.4, aside from those referenced below, have previously been responded to within 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281], within Section 3.13 Cumulative Effects of the Statement of Common Ground with Essex County Council [REP1-014] or within Table O1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	4.4.10, 4.4.11, 4.4.26, 4.4.58, 4.4.60, 4.4.63- 4.4.65, 4.4.71, 4.4.75 – 4.4.78 – Response provided in Cumulative Effects section of this report
	4.4.4 – 4.4.7, 4.4.25, 4.4.29 – 4.4.32 – Response provided in Draft Development Consent Order, Requirements and Management Plans section of this report
	4.4.33, 4.4.34, 4.4.40- 4.4.42, 4.4.45, 4.4.46, 4.4.53 – Response provided in Traffic and Transport section of this report
	4.4.67 – Response provided in Landscape and Visual - Landscape Compensation section of this report
4.5 Highways & Transportation including Public Rights of Way (PROW)	Matters raised in Section 4.5, aside from those referenced below, have previously been responded to within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271], within Section 3.11 Traffic and Transport of the Statement of Common Ground with Essex County Council [REP1-014] or within Table O1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	4.5.65, 4.5.66, 4.5.68, 4.5.70- 4.5.75, 4.5.77, 4.5.78, 4.5.80, 4.5.81, 4.5.85 – 4.5.87, 4.5.89, 4.5.91, 4.5.92, 4.5.98, 4.5.99, 4.5.101 – 4.5.104, 4.5.106, 4.5.108, 4.5.112 – Response provided in Traffic and Transport section of this report
4.6 Minerals & Waste	Matters raised in Section 4.6 have previously been responded to within 6.9 Environmental Statement Chapter 9 -

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	Contaminated Land Geology and Hydrogeology [APP-181], with Section 3.5 Contaminated Land, Geology and Hydrogeology of the Statement of Common Ground with Essex County Council [REP1-014] or within Table O1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
4.7 Flood Risk, Drainage and Surface Water	Matters raised in Section 4.7, aside from those referenced below, have previously been responded to within 6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221], Section 3.8 Hydrology, Land Drainage and Flood Risk of the Statement of Common Ground with Essex County Council [REP1-014] or within Table O1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	4.7.20 – 4.7.24, 4.7.26 – Response provided in Water Environment (Hydrology, Land Drainage and Flood Risk) section of this report
4.8 Socio-Economics	Matters raised in Section 4.8, aside from those referenced below, have previously been responded to within 6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265], Section 3.10 Socio-economics, Recreation and Tourism of the Statement of Common Ground with Essex County Council [REP1-014] or within Table O1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	4.8.7, 4.8.11 – Response provided in Socio-economics, Recreation and Tourism - Employment, Skills, Training and Local Supply Chain section of this report
	4.8.16, 4.8.18 – 4.8.19 – Response provided in Socio-economics, Recreation and Tourism section of this report
	4.8.23, 4.8.27 – 4.8.31 – Response provided in Socio-economics, Recreation and Tourism - Employment, Skills, Training and Local Supply Chain section of this report
4.9 Health and Wellbeing	Matters raised in Section 4.9, aside from those referenced below, have previously been responded to within 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192], Section 3.6 Health and Wellbeing of the Statement of Common Ground with Essex County Council [REP1-014] or within Table O1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	4.9.30, 4.9.31, 4.9.34, 4.9.36, 4.9.41, 4.9.47, 4.9.50 – Responses provided in Health and Wellbeing section of this report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	4.9.44, 4.9.54 – Response provided in Socio-economics, Recreation and Tourism - Community Benefits of this report
	4.9.48, 4.9.49 – Response provided in Air Quality and Emissions (Air Quality) section of this report
4.10. Landscape	Matters raised in Section 4.10, aside from those referenced below, have previously been responded to within 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], Section 3.9 Landscape and Visual of the Statement of Common Ground with Essex County Council [REP1-014] or within Table O1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
	4.10.2, 4.10.4, 4.10.5, 4.10.6, 4.10.32, 4.10.39, 4.10.42, 4.10.43 – Response provided in the Landscape and Visual - Landscape Compensation section of this report
	4.10.41 – Response provided in Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting section of this report
	4.10.18 – 4.10.20, 4.10.23, 4.10.25 - 4.10.27 – Response provided in Landscape and Visual section of this report
4.11. Green Infrastructure	Matters raised in Section 4.11, aside from those referenced below, have previously been responded to within 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], Section 3.9 Landscape and Visual of the Statement of Common Ground with Essex County Council [REP1-014] or within Table O1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
	4.11.4, 4.11.8, 4.11.10, 4.11.13 – Response provided in Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain section of this report
	4.11.8 – Response provided in Landscape and Visual - Landscape Compensation section of this report
	4.11.13 – Response provided in Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting section of this report
4.12. Ecology and Biodiversity Net Gain	Matters raised in Section 4.12, aside from those referenced below, have previously been responded to within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [APP-158 and AS-026], with Section 3.3 Ecology and Biodiversity of the Statement of Common Ground with Essex County Council [REP1-014] or within Table O1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	4.12.22 – Response provided in Biodiversity, Ecology and Nature Conservation (Ecology and Biodiversity) section of this report
	4.12.23 - Response provided in Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain section of this report
4.13. Historic Environment	Matters raised in Section 4.13, aside from those referenced below, have previously been responded to within 6.11 Environmental Statement Chapter 11- Historic Environment [APP-208 and AS-068], within Section 3.7 Historic Environment of the Statement of Common Ground with Essex County Council [REP1-014] or within Table O1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
	4.13.20, 4.13.21, 4.13.25, 4.13.27, 4.13.28, 4.13.36 – 4.13.41 – Response provided in Historic Environment section of this report
4.14. Historic Buildings	Matters raised in Section 4.14, aside from those referenced below, have previously been responded to within 6.11 Environmental Statement Chapter 11- Historic Environment [APP-208 and AS-068], within Section 3.7 Historic Environment of the Statement of Common Ground with Essex County Council [REP1-014] or within Table O1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
	4.14.8 - Response provided in Historic Environment section of this report
5. Development Consent Order	Response provided in Draft Development Consent Order, Requirements and Management Plans section of this report
	5.2.4 – 5.2.8 – Response provided in Pre-Commencement Operations section of this report
	5.2.9 – 5.2.11 – Response provided in Environmental Impact Assessment – General of this report
	5.3.8 – 5.3.11, 5.7.13 – Response provided in Historic Environment section of this report
	5.7.29, 5.7.42 - 5.7.48 - Response provided in Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain section of this report
	5.7.30 – Response provided in Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting section of this report
6. Management Plans	Response provided in Draft Development Consent Order, Requirements and Management Plans section of this report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	6.16.1 - 6.16.3 – Response provided in Environmental Impact Assessment – General of this report
	6.16.5, 6.16.6, 6.19.1, 6.22.5 – Response provided in Historic Environment section of this report
	6.17.2, 6.22.2 - Response provided in Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain section of this report
	6.20.4 – 6.20.6, 6.20.9 – 6.20.12, 6.21.5 – 6.21.7, 6.21.9 – 6.21.11, 6.21.13, 6.21.14 – Response provided in Traffic and Transport section of this report
	6.22.3 – Response provided in Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting section of this report

A.4 Thurrock Council

Table A.4 The Applicant's Regard to Thurrock Council's Local Impact Report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
1.0 Glossary of Acronyms	N/A – no response required, introductory content
2.0 Overview	N/A – no response required, introductory content
3.0 Terms of Reference	Introductory content 3.16 - Response provided within Chapter 3: Needs Case and Timing and Alternatives - Offshore Alternatives
4.0 Description of NSIP and Area with Reference to Proposed Development	N/A – no response required, introductory content
5.0 Policy Context	Policy context has been considered through 5.6 Planning Statement [APP-085] and 5.7 Policy Compliance Document [APP-086] , and 8.4.2 Policy Compliance Tracker [REP1-133]
6.1 Highways and Transport	Matters raised in Section 6.1, aside from those referenced below, have previously been responded to within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] , within Section 3.10 Traffic and Transport of the Statement of Common Ground with Thurrock Council [REP1-016] or within Table AE1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132] . 6.1.13-6.1.15, 6.1.16- 6.1.17, 6.1.22, 6.1.25, 6.1.47, 6.1.50, 6.1.56-6.1.58, 6.1.66 - Response provided in Chapter 4: Traffic and Transport
6.2 Landscape	Matters raised in Section 6.2, aside from those referenced below, have previously been responded to within 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] , Section 3.9 Landscape and Visual of the Statement of Common Ground with Thurrock Council [REP1-016] or within Table AE1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132] . 6.2.1-6.2.3 – Responses provided within Chapter 3: Landscape and Visual - Landscape Compensation 6.2.15, 6.2.19 - Response provided within Chapter 4: Landscape and Visual 6.2.22 - Response provided within Chapter 4: Cumulative Effects
6.3 Ecology	Matters raised in Section 9, aside from those referenced below, have previously been responded to within Environmental Statement Chapter 8 - Ecology and Biodiversity

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	[APP-158], within Sections 3.3 Ecology and Biodiversity of the Statements of Common Ground with Thurrock Council [REP1-016] or within Table AE1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
	6.3.23 – Response provided within Chapter 4: Biodiversity, Ecology and Nature Conservation (Ecology and Biodiversity)
6.4 Built Heritage	Matters raised in Section 6.4, aside from those referenced below, have previously been responded to within 6.11 Environmental Statement Chapter 11- Historic Environment [APP-208 and AS-068], within Section 3.6 Historic Environment of the Statement of Common Ground with Thurrock Council [REP 1-016] or within Table AE1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	6.4.28-6.4.29, 6.4.31-6.4.34, 6.4.46-6.4.47, 6.4.48, 6.4.49, 7.0 Appendix A – Response provided within Chapter 4: Historic Environment
6.5 Air Quality	Matters raised in Section 6.8 have previously been responded to within Environmental Statement Chapter 10 - Health and Wellbeing [APP-192], Chapter 7 – Air Quality [APP-147], within Section 3.5 Health and Wellbeing (including Air Quality and Noise and Vibration) of the Statement of Common Ground with Thurrock Council [REP 1-016] or within Table AE1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	6.5.13 - 6.5.17, 6.5.23 – Response provided in Chapter 4: Air Quality and Emissions (Air Quality)
6.6 Noise and Vibration	Matters raised in Section 6.6 have been responded to within Environmental Statement Chapter 14 Noise and Vibration [APP-256], within sections 3.5 of the Statement of Common Ground with Thurrock Council [REP 1-016] or within Table AE1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
6.7 Economic Development	Matters raised in Section 6.7, aside from those referenced below, have previously been responded to within Environmental Statement Chapter 15 Socio-economics, Recreation and Tourism [APP-265] and Chapter 17 – Cumulative Effects [APP-281], within Section 3.9 Socio-economics, Recreation and Tourism of the Statement of Common Ground with Thurrock Council [REP 1-016] or within Table AE1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	6.7.13, 6.7.16 - 6.7.17, 6.7.19, 6.7.23 - Response provided within Chapter 4: Socio-economics, Recreation and Tourism

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	6.7.22 - Response provided within Chapter 4: Cumulative Effects
6.8 Public Health	Matters raised in Section 6.8 have previously been responded to within Environmental Statement Chapter 10 - Health and Wellbeing [APP-192] , Chapter 7 – Air Quality [APP-147] , within Section 3.5 Health and Wellbeing (including Air Quality and Noise and Vibration) of the Statement of Common Ground with Thurrock Council [REP 1-016] or within Table AE1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132] .
	6.8.6, 6.8.7, 6.8.43-6.8.45 - Response provided within Chapter 4: Cumulative Effects
	6.8.10, 6.8.11, 6.8.28 - Response provided within Chapter 4: Health and Wellbeing
	6.8.24 – Response provided in Chapter 4: Planning Policy
6.9 Local Lead Flood Authority	Matters raised in Section 6.9 have previously been responded to within Environmental Statement Chapter 12 – Hydrology, Land Drainage and Flood Risk [APP-221] , within Section 3.7 Hydrology, Land Drainage and Flood Risk of the Statement of Common Ground with Thurrock Council [REP 1-016] or within Table AE1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132] .
	6.9.3, 6.9.51 - 6.9.54 – Response provided within Chapter 4: Water Environment (Hydrology, Land Drainage and Flood Risk)
6.10 Emergency Planning	Matters raised in Section 6.9 have previously been responded to within Environmental Statement Chapter 12 – Hydrology, Land Drainage and Flood Risk [APP-221] , within Section 3.7 Hydrology, Land Drainage and Flood Risk of the Statement of Common Ground with Thurrock Council [REP 1-016] or within Table AE1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132] .
	6.10.15, 6.10.16 - Response provided within Chapter 4: Water Environment (Hydrology, Land Drainage and Flood Risk)
6.11 Climate Change	6.11.13 - Response provided within Chapter 3: Environmental Impact Assessment - General
	6.11.19 - Response provided within Chapter 4: Water Environment (Hydrology, Land Drainage and Flood Risk)
	6.11.20 - Response provided within Chapter 4: Cumulative Effects

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
6.12 Community Development	Matters raised in Section 6.8 have previously been responded to within Environmental Statement Chapter 10 - Health and Wellbeing [APP-192] , Chapter 7 – Air Quality [APP-147] , Chapter 15 Socio-economics, Recreation and Tourism [APP-265] , within Section 3.5 Health and Wellbeing (including Air Quality and Noise and Vibration) of the Statement of Common Ground with Thurrock Council [REP 1-016] or within Table AE1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132] .
	6.12.27 - 6.12.29 - Response provided within Chapter 4: Socio-economics, Recreation and Tourism
6.13 Waste and Recycling	Matters raised in Section 6.13 have previously been responded to within 6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181] , or Section 3.4 Contaminated Land, Geology and Hydrogeology of the Statement of Common Ground with Thurrock Council [REP 1-016] .
	6.13.11, 6.13.12, 6.13.25, 6.14.25 - Response provided in Chapter 4: Traffic and Transport
	6.13.26 – 6.13.28, 6.13.31, 6.13.34 - Response provided within Chapter 3: Environmental Impact Assessment - General
6.14 Recreation and Leisure	Matters raised in Section 6.14, aside from those referenced below, have previously been responded to within Environmental Statement Chapter 15 Socio-economics, Recreation and Tourism [APP-265] and Chapter 17 – Cumulative Effects [APP-281] , within Section 3.11 Public Rights of Way (PRoW) of the Statement of Common Ground with Thurrock Council [REP 1-016] or within Table AE1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132] .
	6.14.12, 6.14.25 - Response provided within Chapter 3: Environmental Impact Assessment - General
	6.14.27-6.14.29 - Response provided in Chapter 4: Planning Policy
6.15 Local Plan	Matters raised in Section 6.4, aside from those referenced below, have previously been responded to within Table AE1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132] .
	6.15.1 - Response provided in Chapter 4: Planning Policy
	6.15.6 - Response provided within Chapter 3: Land Use - Green Belt

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
6.16 Archaeology	Matters raised in Section 6.4, aside from those referenced below, have previously been responded to within 6.11 Environmental Statement Chapter 11- Historic Environment [APP-208 and AS-068] , within Section 3.6 Historic Environment of the Statement of Common Ground with Thurrock Council [REP 1-016] or within Table AE1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132] .
	6.16.11 - Response provided in Chapter 4: Planning Policy
6.17 Compulsory Acquisition of Land	6.17.3 to 6.17.22 - Response provided in Chapter 4: Other Matters
7.0 Appendix A: The Council's suggested comments to the Draft Development Consent Order	Response provided within the Draft Development Consent Order, Requirements and Management Plans section of this report Response provided within Chapter 3: Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting Response provided within Chapter 4: Contaminated Land, Geology and Hydrogeology Response provided within Chapter 4: Historic Environment

A.5 South Norfolk District Council

Table A.5 The Applicant's Regard to South Norfolk District Council's Local Impact Report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
Section 1: Introduction	N/A – no response required, introductory content
Section 2: Executive Summary	N/A – no response required, introductory content
Section 3: Key Local Impacts	Matters raised in Section 3, aside from those referenced below, have previously been responded to within the Environmental Statement chapter 13 – Landscape and Visual [APP-226], within the Statement of Common Ground with South Norfolk District Council sections 3.3 - 3.8 [REP1-018] or within Table AA1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
Section 3.1.1 - 3.1.2: Heritage	Matters raised in Section 3.1.1 - 3.1.2, have previously been responded to within the Environmental Statement chapter 11 – Historic Environment, [APP-158], within the Statement of Common Ground with South Norfolk District Council section 3.10 [REP1-018] or within Table AA1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
Section: 3.1.3 - 3.1.9 Landscape and Visual Effects	3.1.3 Response provided in the Landscape and Visual section of this report
	3.1.7 Response provided in the Cumulative Effects section of this report
	3.1.8 Response provided in the Landscape and Visual section of this report
Section 3.1.10 -3.1.16: Noise and Vibration	Matters raised in Section 3.1.10 - 3.1.16, have previously been responded to within the Environmental Statement chapter 14 – Noise and Vibration, [APP-256], within the Statement of Common Ground with South Norfolk District Council sections 3.5 - 3.10 [REP1-018] or within Table AA1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
Section 3.1.17 - 3.1.18: Ecology and Biodiversity	Matters raised in Section 3.1.17 - 3.1.18, have previously been responded to within the Environmental Statement chapter 8 – Ecology and Biodiversity, [APP-158], within the Statement of Common Ground with South Norfolk District Council sections 3.3 [REP1-018] or within Table AA1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
Section 3.1.19 - 3.1.20: Cumulative Impacts	Matters raised in Section 3.1.17 - 3.1.18, have previously been responded to within the Environmental Statement chapter 17 –

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	Cumulative Effects, [APP-281], within the Statement of Common Ground with South Norfolk District Council sections 3.3 [REP1-018] or within Table AA1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
Section 3.2: Overall Position of the Local Authority	N/A – no response required, introductory content
Section 4: Description of the proposed development	N/A – no response required, introductory content
Section 5: Relevant development proposals	Matters raised in Section 5, aside from those referenced below, have previously been responded to within the Environmental Statement chapters [APP-123-298], within the Statement of Common Ground with South Norfolk District Council sections 3.2 - 3.12 [REP1-018] or within Table AA1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
Section 5.1: Overview	N/A – no response required, introductory content
Section 5.2: Nationally Significant Infrastructure Projects (NSIPs)	5.2.1 Response provided in the Cumulative effects section of this report
	5.2.2 Response provided in the Cumulative effects section of this report
Section 5.3: Major Town and Country Planning Act (TCPA) Applications	5.3.2 Response provided in the Cumulative effects section of this report
Section 5.4: Interaction between the proposed Overhead line and other development	N/A – no response required, introductory content, references table 7 – Local area context.
Section 6: Relevant Planning Policies	Matters raised in Section 6, aside from those referenced below, have previously been considered through 5.6 Planning Statement [APP-085] and 5.7 Policy Compliance Document [APP-086] , and 8.4.2 Policy Compliance Tracker [REP1-133] .
	6.2 Response provided in the Planning Policy section of this report
Section 7: Local Area Context	Introductory Content – Local Context 7.3.2 Response provided in the Cumulative effects section of this report
Section 8: Topic-based Assessment of Impacts	Matters raised in Section 8, aside from those referenced below, have previously been responded to within the Environmental Statement chapters 8,11,13,15 and 17 – Ecology and Biodiversity,

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	Historic Environment, Landscape and Visual, Socio-Economics, Recreation and Tourism, Cumulative Effects [APP-158-282], within the Statement of Common Ground with South Norfolk District Council sections 3.3 - 3.10 [REP1-018] or within Table AA1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
Section 8.1: Heritage Assets	8.1.3 - 8.1.5 Response provided in the Historic Environment section of this report
Section 8.2: Landscape and Visual Impact	8.2.5 - 8.2.6 Response provided in the Landscape and Visual section of this report
Section 8.3: Noise, Vibration and Pollution	Matters raised in Section 8.3, have previously been responded to within the Environmental Statement chapter 14 – Noise and Vibration, [APP-256], within the Statement of Common Ground with South Norfolk District Council sections 3.5 - 3.10 [REP1-018] or within Table AA1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
Section 8.4: Ecology and Biodiversity	8.4.3 - 8.4.5 Response provided in the Ecology and Biodiversity section of this report
Section 8.5: Cumulative Impacts	8.5.1 Response provided in the Cumulative effects section of this report
	8.5.4 Response provided in the Ecology and Biodiversity section of this report
Section 8.6: Socio-Economic and Community Effects	8.6.2 Response provided in the Socio-economics, Recreation and Tourism section of this report
Section 9: Consideration of Draft Development Consent Order (DCO)	Matters raised in Section 9, aside from those referenced below, have previously been responded to within the Draft Development Consent Order, Requirements and Management Plans section of this report.
	9.2.3 Response provided in the Historic Environment section of this report
	9.5.1 Response provided in the Contaminated Land, Geology and Hydrogeology and and Hydrology, Land Drainage and Flood Risk sections of this report
Section 10: Summary of Principle Issues for the Examination	Matters raised in Section 10, aside from those referenced below, have previously been responded to within the Environmental Statement chapters 11, 15 and 17 – Historic Environment, Socio-Economics, Recreation and Tourism, Cumulative Effects [APP-158-282], within the Statement of Common Ground with South Norfolk District Council sections 3.3 - 3.10 [REP1-018] or within Table AA1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
Section 10.1: Overview	N/A - No response required, overview
Section 10.2: Landscape and Visual Harm	Matters raised in Section 10.2, have previously been responded to within the Environmental Statement chapter 13 – Landscape and Visual, [APP-226], within the Statement of Common Ground with South Norfolk District Council sections 3.3-3.8 [REP1-018] or within Table AA1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
Section 10.3: Heritage Impacts	10.3.1 - 10.3.2 Response provided in the Historic Environment Section of this report
Section 10.4: Ecological Risks and Designated sites	Matters raised in Section 10.4, have previously been responded to within the Environmental Statement chapter 8 – Ecology and Biodiversity, [APP-158], within the Statement of Common Ground with South Norfolk District Council sections 3.3 [REP1-018] or within Table AA1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
Section 10.5: Noise, Vibration and Pollution Concerns	Matters raised in Section 8.3, have previously been responded to within the Environmental Statement chapter 14 – Noise and Vibration, [APP-256], within the Statement of Common Ground with South Norfolk District Council sections 3.5 - 3.10 [REP1-018] or within Table AA1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
Section 10.6: Cumulative Impact of Energy and Infrastructure Projects	10.6.2 Response provided in the Landscape and Visual section of this report
Section 10.7: Draft DCO Requirements and Governance Issues	10.7.1 Response provided in the Contaminated Land, Geology and Hydrogeology section of this report
Section 10.8: Socio-Economic and Community Effects	10.8.1- 10.8.2 Response provided in the Socio-economics, Recreation and Tourism section of this report
Section 11: Local Authority conclusions	Matters raised in Section 11, aside from those referenced below, have previously been responded to within the Environmental Statement [APP-123 - 282], within the Statement of Common Ground with South Norfolk District Council sections 3.3 - 3.13 [REP1-018] or within Table AA1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	11.2.1 Response provided in the Landscape and Visual section of this report
	11.3.1 Response provided in the Contaminated Land, Geology and Hydrogeology section of this report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
Section 12: Appendices	Matters raised in Section 11, aside from those referenced below, have previously been responded to within the Environmental Statement [APP-123 - 282], within the Statement of Common Ground with South Norfolk District Council sections 3.3 - 3.13 [REP1-018] or within Table AA1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
Appendix A: Relevant Development Plan Policies	Matters raised in Appendix A, have previously been considered through 5.6 Planning Statement [APP-085] and 5.7 Policy Compliance Document [APP-086] , and 8.4.2 Policy Compliance Tracker [REP1-133] .
Appendix B: Maps and Plans	N/A - No Response needed, Maps
Appendix C – Cumulative Schemes List	12.4.1 Response provided in the Cumulative effects section of this report
Appendix D: Council Commentary on the draft DCO requirements	Matters raised in Appendix D, have previously been responded to within the Draft Development Consent Order, Requirements and Management Plans section of this report.
Appendix E: Additional Supporting Material	N/A - No Response Needed, additional information

A.6 Tendring District Council

Table A.6 The Applicant's Regard to Tendring District Council's Local Impact Report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
1. Purpose of this Document	N/A – no response required, introductory content
2. Overview	N/A – mainly no response required, introductory content / impacts tackled more fully later in Local Impact Report
	2.12 – Responded to in the Landscape and Visual section of this report
3. Terms of Reference	N/A – no response required, introductory content
4. Description of the Area of the Proposed Development	N/A – no response required, introductory content
5. Policy Context	Policy context has been considered through 5.6 Planning Statement [APP-085] and 5.7 Policy Compliance Document [APP-086], and 8.4.2 Policy Compliance Tracker [REP1-133]
6. TDC's in Principle Position – paragraphs 6.1 – 6.3	N/A – no response required, introductory content
6. TDC's in Principle Position – paragraphs 6.4 – 6.13	Response provided in the following sections of this report: Needs Case and Timing Alternatives - Offshore Alternatives Alternatives – East Anglia Connection Node Siting Landscape and Visual - Furthering the Purposes of the National Landscape Socio-economics, Recreation and Tourism - Community Benefits
7. EACN Location, Project Corridor Locations (underground cables and pylons corridor) & Site Selection Issues in Tendring and responses to arguments by National Grid as set out	Response provided in Alternatives – East Anglia Connection Node Siting section of this report
8. Agriculture and Soils	Matters raised in Section 8, aside from those referenced below, have previously been responded to within 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] or within Table AD1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
	8.17, 8.22, 8.24 - Response provided in the Land Use (Agriculture and Soils) section of this report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	8.25 - Response provided in the Cumulative Effects section of this report
9. Air Quality	Matters raised in Section 9, aside from those referenced below, have previously been responded to within 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147], within Section 3.5 Air Quality of the Statement of Common Ground with Tendring District Council [REP1-022], or within Table AD1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
	9.3, 9.10 – Response provided in the Air Quality and Emissions (Air Quality) section of this report
	9.8, 9.9 - Response provided in the Environmental Impact Assessment – General section of this report
10 Cumulative Effects	Matters raised in Section 10, aside from those referenced below, have previously been responded to within 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281], within Section 3.11 Cumulative Effects of the Statement of Common Ground with Tendring District Council [REP1-022], or within Table AD1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
	10.2, 10.7- 10.20, 10.23- 10.28 – Response provided in the Cumulative Effects section of this report
11 Contaminated Land and Geology	Matters raised in Section 11 have previously been responded to within 6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181] or within Table AD1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
12 Coordination with other projects	12.1 – Refer to 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134]
	12.2 - Response provided in the Cumulative Effects section of this report
	12.3, 12.5, 12.11 – Response provided in the Traffic and Transport section of this report
	12.6, 12.16 – Response provided in the Landscape and Visual section of this report
13 Construction Noise and Vibration – Working Hours	Matters raised in Section 13, aside from those referenced below, have previously been responded to within 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256], Section 3.6 Noise and Vibration of the Statement of Common Ground with Tendring District Council [REP1-022], or

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	within Table AD1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
	13.19 – 13.21 – Response provided in Noise and Vibration section of this report
14 Impacts on Health and Wellbeing	Matters raised in Section 14, aside from those referenced below, have previously been responded to within 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192], Section 3.7 Health and Wellbeing of the Statement of Common Ground with Tendring District Council [REP1-022], or within Table AD1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
	14.1, 14.5, 14.15 – 14.21 – Response provided in Health and Wellbeing section of this report
15 Historic Environment	Matters raised in Section 15, aside from those referenced below, have previously been responded to within 6.11 Environmental Statement Chapter 11- Historic Environment [APP-208 and AS-068], Section 3.8 Historic Environment of the Statement of Common Ground with Tendring District Council [REP1-022], or within Table AD1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
	15.6, 15.7, 15.9 – 15.15, 15.17 – 15.21 – Response provided in Noise and Vibration section of this report
16 Hydrology, Land Drainage and Flood Risk	Matters raised in Section 16, aside from those referenced below, have previously been responded to within 6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221], or within Table AD1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
	16.5, 16.6, 16.8, 16.12, 16.19 – Response provided in Water Environment (Hydrology, Land Drainage and Flood Risk) section of this report
17 Community Benefits and Compensation	17.1 introductory text; 17.2 – Response provided in Landscape and Visual - Landscape Compensation section of this report
18 Socio-economics, Leisure and Tourism	Response provided in Socio-economics, Recreation and Tourism section of this report
19 Traffic and Transport	Matters raised in Section 19, aside from those referenced below, have previously been responded to within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271], or within Table AD1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
	19.3 – 19.5 – Response provided in the Traffic and Transport section of this report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
20 General Landscape Implications, Impact on Trees, Ecology and Biodiversity	Matters raised in Section 20, aside from those referenced below, have previously been responded to within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [APP-158] and [AS-026], 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], Section 3.3 Ecology and Biodiversity and Section 3.9 Landscape and Visual of the Statement of Common Ground with Tendring District Council [REP1-022], or within Table AD1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
	20.4 – 20.6, 20.11 – Response provided in Landscape and Visual section of this report
	20.15 – Response provided in Biodiversity, Ecology and Nature Conservation (Ecology and Biodiversity) section of this report
	20.16, 20.17, 20.20 – Response provided in Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain section of this report
21 Skills and Employment	Matters raised in Section 21 have previously been responded to within 6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265], Section 3.10 Socio-economics, Recreation and Tourism of the Statement of Common Ground with Tendring District Council [REP1-022], or within Table AD1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
22 Development Consent Order	N/A – no response required, no issues raised but cross-refers instead to Essex County Council Local Impact Report
23 Statement of Common Ground	N/A – no response required. Tendring District Council cross-refer to the draft Statement of Common Ground submitted at Deadline 1, stating that the majority of themes and unresolved issues documented in the Local Impact Report are mirrored in the draft Statement of Common Ground.
24 Overall Conclusion	N/A – no response required, specific issues not raised

A.7 Colchester City Council

Table A.7 The Applicant's Regard to Colchester City Council's Local Impact Report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
1. Terms of reference	N/A – no response required, introductory content
2. Description of the area of the proposed development	Aside from 2.9 referenced below, this section is N/A – no response required, introductory content
	2.9 - Response provided in the Planning Policy section of this report
3. Policy Context/Relevant Planning Policy	Matters raised in Section 3, aside from those referenced below, have previously been considered through 5.6 Planning Statement [APP-085] , 5.7 Policy Compliance Document [APP-086] , and 8.4.2 Policy Compliance Tracker [REP1-133] .
4. Principle of project	Matters raised in Section 4, aside from those referenced below, have previously been responded to within Environmental Statement Chapter 4- Project Description [APP-130], within section 3.2 of the Statement of Common Ground with Colchester City Council [REP1-024] or within Table I1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	4.1 - Response provided in the Alternatives - Technology Choice – Overhead Line and Underground Cables section of this report
	4.70 - Response provided in the Biodiversity, Ecology and Nature Conservation (Ecology and Biodiversity) section of this report
	4.71 - Response provided in the Biodiversity, Ecology and Nature Conservation (Ecology and Biodiversity) section of this report
5. Agriculture and soils	Matters raised in Section 5 have previously been responded to within Environmental Statement Chapter 6- Agriculture and Soils [APP-138], or within Table I1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
6. Air Quality	Matters raised in Section 6 have previously been responded to within Environmental Statement Chapter 7- Air Quality [APP-147], within section 3.4 of the Statement of Common Ground with Colchester City Council [REP1-024] or within Table I1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
7. Ecology and Biodiversity	Matters raised in Section 7, aside from those referenced below, have previously been responded to within Environmental Statement Chapter 8 – Ecology and

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	Biodiversity [AS-026], within section 3.3 of the Statement of Common Ground with Colchester City Council [REP1-024] or within Table I1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	7.31 - Response provided in the Biodiversity, Ecology and Nature Conservation (Ecology and Biodiversity) section of this report
	7.32 - Response provided in the Biodiversity, Ecology and Nature Conservation – Biodiversity Net Gain section of this report
	7.38 - Response provided in the Biodiversity, Ecology and Nature Conservation – Biodiversity Net Gain section of this report
	7.52 - Response provided in the Biodiversity, Ecology and Nature Conservation – Biodiversity Net Gain section of this report
	7.54 - Response provided in the Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting section of this report
	7.72 - Response provided in the Biodiversity, Ecology and Nature Conservation – Biodiversity Net Gain section of this report
	7.78 - Response provided in the Biodiversity, Ecology and Nature Conservation – Biodiversity Net Gain section of this report
8. Contaminated Land, Geology & Hydrogeology	Matters raised in Section 8, have previously been responded to within Environmental Statement Chapter 9 – Contaminated Land Geology and Hydrogeology [APP-181], or within Table I1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
9. Health and Wellbeing	Matters raised in Section 9, aside from those referenced below, have previously been responded to within Environmental Statement Chapter 10 – Health and Wellbeing [APP-192], within section 3.6 of the Statement of Common Ground with Colchester City Council [REP1-024] or within Table I1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	9.19 - Response provided in the Health and Wellbeing section of this report
	9.23 - Response provided in the Cumulative Effects section of this report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	9.35 - Response provided in the Cumulative Effects section of this report
	9.39 - Response provided in the Cumulative Effects section of this report
	9.42 - Response provided in the Health and Wellbeing section of this report
10. Historic Environment	Matters raised in Section 10, aside from those referenced below, have previously been responded to within Environmental Statement Chapter 11– Historic Environment [AS-068], within section 3.7 of the Statement of Common Ground with Colchester City Council [REP1-024] or within Table I1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	10.62 - Response provided in the Historic Environment section of this report
	10.81 - Response provided in the Historic Environment section of this report
	10.86 - Response provided in the Historic Environment section of this report
	10.104 - Response provided in the Historic Environment section of this report
	10.106 - Response provided in the Historic Environment section of this report
11. Hydrology, Land Drainage and Flood Risk	Matters raised in Section 11, aside from those referenced below, have previously been responded to within Environmental Statement Chapter 12 – Hydrology Land Drainage and Flood Risk [APP-221], or within Table I1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	11.20 – 11.23 - Response provided in the Water Environment (Hydrology, Land Drainage and Flood Risk) section of this report
	11.25 - Response provided in the Water Environment (Hydrology, Land Drainage and Flood Risk) section of this report
	11.27 - Response provided in the Water Environment (Hydrology, Land Drainage and Flood Risk) section of this report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	11.28 - Response provided in the Water Environment (Hydrology, Land Drainage and Flood Risk) section of this report
12. Landscape and Visual	Matters raised in Section 12, aside from those referenced below, have previously been responded to within Environmental Statement Chapter 13 – Landscape and Visual [APP-1226], within section 3.8 of the Statement of Common Ground with Colchester City Council [REP1-024] or within Table I1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	12.43 – 12.44 - Response provided in the Landscape and Visual section of this report
	12.46 – 12.47 - Response provided in the Landscape and Visual section of this report
	12.50 - Response provided in the Landscape and Visual section of this report
	12.57 - Response provided in the Landscape and Visual section of this report
	12.71 – 12.75 - Response provided in the Landscape and Visual section of this report
	12.76 - Response provided in the Planning Policy section and in the Landscape and Visual section of this report
	12.78 - Response provided in the Landscape and Visual section of this report
	12.79 - Response provided in the Alternatives - Technology Choice – Overhead Line and Underground Cables section of this report
	12.80 - Response provided in the Landscape and Visual section of this report
	12.81 - Response provided in the Landscape and Visual section of this report
	12.83 - Response provided in the Landscape and Visual section of this report
	12.85 - Response provided in the Landscape and Visual section of this report
	12.87 – 12.89 - Response provided in the Landscape and Visual section of this report
	12.91 - Response provided in the Landscape and Visual section of this report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	12.94 - Response provided in the Landscape and Visual section of this report
	12.97 - Response provided in the Landscape and Visual - Landscape Compensation section of this report
	12.98 - Response provided in the Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting section of this report
	12.102 - Response provided in the Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting section of this report
	12.103 - Response provided in the Landscape and Visual - Landscape Compensation section of this report
	12.104 – 12.108 - Response provided in the Planning Policy section of this report
	12.109 - Response provided in the Landscape and Visual section of this report
	12.110 - Response provided in the Landscape and Visual - Landscape Compensation section of this report
	12.111 - Response provided in the Landscape and Visual section of this report
	12.114 - Response provided in the Landscape and Visual section of this report
	12.116 - Response provided in the Landscape and Visual - Landscape Compensation section of this report
	12.121 - Response provided in the Alternatives - Technology Choice – Overhead Line and Underground Cables section and the Landscape and Visual - Landscape Compensation section of this report
	12.122 – 12.123 - Response provided in the Alternatives - Technology Choice – Overhead Line and Underground Cables section of this report
	12.126 - Response provided in the Landscape and Visual - Landscape Compensation section of this report
	12.130 - Response provided in the Landscape and Visual - Landscape Compensation section of this report
	12.133 - Response provided in the Landscape and Visual section of this report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	12.134 - Response provided in the Landscape and Visual section of this report
	12.140 - Response provided in the Landscape and Visual - Landscape Compensation section of this report
	12.141 - Response provided in the Landscape and Visual - Landscape Compensation section of this report
	12.145 - Response provided in the Cumulative Effects section of this report
	12.149 - Response provided in the Landscape and Visual section of this report
	12.153 - Response provided in the Landscape and Visual section of this report
	12.156 - Response provided in the Landscape and Visual section of this report
	12.161 – 12.164 - Response provided in the Landscape and Visual section of this report
	12.165 - Response provided in the Landscape and Visual – Furthering the Purposes of the National Landscape section of this report
	12.167 - Response provided in the Landscape and Visual section of this report
	12.172 - Response provided in the Landscape and Visual section of this report
	12.173 - Response provided in the Landscape and Visual section of this report
	12.178 - Response provided in the Landscape and Visual section of this report
	12.180 – 12.182 - Response provided in the Landscape and Visual section of this report
	12.186 - Response provided in the Landscape and Visual section of this report
	12.188 – 12.191 - Response provided in the Landscape and Visual section of this report
	12.199 - Response provided in the Landscape and Visual section of this report
	12.200 - Response provided in the Landscape and Visual section of this report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	12.203 - Response provided in the Landscape and Visual section of this report
	12.206 – 12.209 - Response provided in the Landscape and Visual section of this report
	12.213 - Response provided in the Landscape and Visual section of this report
	12.216 – 12.218 - Response provided in the Landscape and Visual section of this report
	12.225 - Response provided in the Landscape and Visual section of this report
	12.227 - Response provided in the Landscape and Visual section of this report
	12.228 - Response provided in the Landscape and Visual section of this report
	12.230 - Response provided in the Landscape and Visual section of this report
	12.232 - Response provided in the Landscape and Visual section of this report
	12.234 - Response provided in the Landscape and Visual section of this report
	12.237 - Response provided in the Landscape and Visual section of this report
	12.239 - Response provided in the Landscape and Visual section of this report
	12.242 – 12.244 - Response provided in the Landscape and Visual section of this report
	12.249 - Response provided in the Landscape and Visual section of this report
	12.252 – 12.253 - Response provided in the Alternatives - Technology Choice – Overhead Line and Underground Cables section of this report
13. Noise and Vibration	Matters raised in Section 13, have previously been responded to within Environmental Statement Chapter 14 – Noise and Vibration [APP-256], within section 3.5 of the Statement of Common Ground with Colchester City Council [REP1-024] or within Table I1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
14. Socio-economics and Tourism	Matters raised in Section 14, aside from those referenced below, have previously been responded to within Environmental Statement Chapter 15 – Socio-economics and Tourism [APP-265], within section 3.9 of the Statement of Common Ground with Colchester City Council [REP1-024] or within Table I1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	14.19 - Response provided in the Socio-economics, Recreation and Tourism section of this report
	14.24 - Response provided in the Socio-economics, Recreation and Tourism section of this report
	14.25 - Response provided in the Socio-economics, Recreation and Tourism section of this report
	14.30 - Response provided in the Cumulative Effects section of this report
15. Traffic and Transport	Matters raised in Section 15, have previously been responded to within Environmental Statement Chapter 16 – Traffic and Transport [APP-271], or within Table I1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
16. Cumulative Effects	Matters raised in Section 16, aside from those referenced below, have previously been responded to within Environmental Statement Chapter 17 – Cumulative Effects [APP-281], within section 3.10 of the Statement of Common Ground with Colchester City Council [REP1-024] or within Table I1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	16.9 - Response provided in the Cumulative Effects section of this report
	16.10 - Response provided in the Cumulative Effects section of this report
17. Draft Development Consent Order	Matters raised in Section 17, aside from those referenced below, have previously been responded to within section 3.11 of the Statement of Common Ground with Colchester City Council [REP1-024] or within Table I1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	17.1 - Response provided in the Environmental Impact Assessment - General section of this report
18. Annex A	

A.8 Braintree District Council

Table A.8 The Applicant's Regard to Braintree District Council's Local Impact Report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
1. Index of Appendices	N/A – no response required, introductory content
2. Glossary of Acronyms and Abbreviations	N/A – no response required, introductory content
3. Terms of Reference	N/A – no response required, introductory content
4. Description of the Area	N/A – no response required, introductory content
5. Policy Context	Matters raised in Section 5, aside from those referenced below, have previously been considered through 5.6 Planning Statement [APP-085] , 5.7 Policy Compliance Document [APP-086] , and 8.4.2 Policy Compliance Tracker [REP1-133] .
6. Principle of Development and Alternatives	Matters raised in Section 6, have previously been responded to within Environmental Statement Chapter 3 – Alternatives [APP-127] , within sections 3.5 of the Statement of Common ground for Braintree District Council [REP 1-026] or within Table E1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132] .
7. Landscape and Visual	8.4.6 - 8.4.10 Response provided in the Ecology and Biodiversity section of this report
	7.5.1 Response provided in the Landscape and Visual section of this report
	7.5.3 Response provided in the Landscape and Visual section of this report
	7.8.2 Response provided in the Landscape and Visual section of this report
	7.10.4 Response provided in the Landscape and Visual section of this report
	7.10.5 Response provided in the Landscape and Visual section of this report
	7.12.2 Response provided in the Landscape and Visual section of this report
8. Biodiversity and Ecology	Matters raised in Section 8, have previously been responded to within Environmental Statement Chapter 8 – Ecology and Biodiversity [APP-158] , within sections 3.5 of the Statement of Common ground for Braintree District Council [REP 1-026] or within Table E1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132] .

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	8.4.6 - 8.4.10 Response provided in the Ecology and Biodiversity section of this report
9. Arboricultural Impacts	Matters raised in Section 9, have previously been responded to within Environmental Statement Chapter 6 and Annex 6.1 and 6.1- Agriculture and Soil [APP-141], within sections 3.3-3.9 of the Statement of Common Ground [REP 1-026] for Braintree District Council [REP 1-026] or within Table E1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
10. Historic Environment	Matters raised in Section 9, aside from those referenced below have been responded to within Environmental Statement Chapter 11 - Historic Environment [APP-208], within section 3.9 of the Statement of Common Ground [REP 1-026] for Braintree District Council or within Table E1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	10.3.2 Response provided in the Historic Environment section of this report
	10.4.5 Response provided in the Historic Environment section of this report
	10.5.5 Response provided in the Historic Environment section of this report
	10.5.7 - 10.5.8 Response provided in the Historic Environment section of this report
	10.5.22 Response provided in the Historic Environment section of this report
	10.5.28 Response provided in the Historic Environment section of this report
	10.6.5 Response provided in the Historic Environment section of this report
	10.6.7 - 10.6.12 Response provided in the Historic Environment section of this report
	10.8.17 - 10.8.22 Response provided in the Historic Environment section of this report
	10.9.1 - 10.9.2 Response provided in the Historic Environment section of this report
	10.10.1 Response provided in the Historic Environment section of this report
11. Geology and Hydrogeology	Matters raised in Section 11, have previously been responded to within Environmental Statement Chapter 9 – Contaminated Land, Hydrogeology and Geology [APP-181], within sections

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	3.5 of the Statement of Common ground for Braintree District Council [REP 1-026] or within Table E1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
12. Agriculture and Soils	Matters raised in Section 12, aside from those referenced below have been responded to within Environmental Statement Chapter 6 - Agriculture and Soils [APP-147], within section 3.4 of the Statement of Common ground [REP 1-026] for Braintree District Council or within Table E1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	12.4.11 - 12.4.12 Response provided in the Agriculture and Soils section of this report
	12.4.16 - 12.4.18 Response provided in the Agriculture and Soils section of this report
	12.5.6 Response provided in the Agriculture and Soils section of this report
	12.6.4 Response provided in the Agriculture and Soils section of this report
13. Air Quality and Emissions	Matters raised in Section 13, have previously been responded to within Environmental Statement Chapter 7 Air Quality [APP-147], within sections 3.3-3.9 of the Statement of Common ground for Braintree District Council [REP 1-026] or within Table E1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
14. Noise and Vibration	Matters raised in Section 14, aside from those listed below have been responded to within Environmental Statement Chapter 14 Noise and Vibration [APP-256], within sections 3.7 of the Statement of Common ground for Braintree District Council [REP 1-026] or within Table E1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	14.4.5 - 14.4.10 Response provided in the Noise and Vibration section of this report
15. Cumulative Effects	Matters raised in Section 15, aside from those listed below have been responded to within Environmental Statement Chapter 17 Cumulative Effects [APP-281], within sections 3.12 of the Statement of Common ground for Braintree District Council [REP 1-026] or within Table E1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	15.3.2 - 15.3.4 Response provided in the Cumulative Effects and Planning Policy sections of this report
	15.4.4 Response provided in the Historic Environment section of this report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	15.4.6 Response provided in the Cumulative Effects section of this report
16. Draft Development Consent Order	Matters raised in Section 16, aside from those listed below been responded to within Environmental Statement [APP 123-289], within section 3.13 of the Statement of Common ground for Braintree District Council [REP 1-026] or within Table E1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	16.2.6 Response provided in the EIA General section of this report
17. Other Matters	Matters raised in Section 17, aside from those listed below been responded to within Environmental Statement [APP 123-289], within sections 3.2 - 3.13 of the Statement of Common ground for Braintree District Council [REP 1-026] or within Table E1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
17.1: Socio-Economic, Recreation and Tourism	Matters raised in Section 17.1, have previously been responded to within Environmental Statement Chapter 15 Socio-Economics, Recreation and Tourism [APP-265], within sections 3.11 of the Statement of Common ground for Braintree District Council [REP 1-026] or within Table E1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
17.2: Highways and Transportation	17.2.1 - 17.2.2 Response provided in the Traffic and Transport section of this report
17.3: Public Rights of Way	Matters raised in Section 17.3, have previously been responded to within Public Rights of Way Management Plan [APP-329] or within Table E1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
17.4: Health and Wellbeing	Matters raised in Section 17.4, have previously been responded to within Environmental Statement Chapter 10 Health and Wellbeing [APP-193], within sections 3.8 of the Statement of Common ground for Braintree District Council [REP 1-026] or within Table E1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
17.5: Hydrology Land Drainage and Flood Risk	Matters raised in Section 17.5, have previously been responded to within Environmental Statement Chapter 12 Hydrology Land Drainage and Flood Risk [APP-221], within sections 3.5 - 3.6 of the Statement of Common ground for Braintree District Council [REP 1-026] or within Table E1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
17.6: Electromagnetic Fields	Matters raised in section 17.6 have been previously responded to in the Electric and Magnetic Field Compliance Report [APP-330]
17.7: Community Benefits	Matters raised in Section 17.7, have previously been responded to within Environmental Statement Chapter 4 Project Description [APP-125], within section 3.2 of the Statement of Common ground for Braintree District Council [REP 1-026] or within Table E1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
18. Summary	Matters raised in Section 18, aside from those listed below been responded to within Environmental Statement [APP 123-289], within sections 3.2 - 3.13 of the Statement of Common ground for Braintree District Council [REP 1-026] or within Table E1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	18.1.4 Response provided in the EIA General section of this report
	18.2.37 - 18.2.38 Response provided in the Cumulative Effects section of this report

A.9 Chelmsford City Council

Table A.9 The Applicant's Regard to Chelmsford City Council's Local Impact Report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
Summary	N/A – no response required, introductory content
1.Introduction and terms of reference	N/A – no response required, introductory content
2.Description of Site and Surroundings	N/A – no response required, introductory content
3.Details of Project	N/A – no response required, introductory content
4.Planning History	N/A – no response required, introductory content
5.Relevant National and Local Policy	Policy context has been considered through 5.6 Planning Statement [APP-085] and 5.7 Policy Compliance Document [APP-086], and 8.4.2 Policy Compliance Tracker [REP1-133]
6.Overarching position on Norwich to Tilbury	Matters raised in Section 6, aside from those referenced below, have previously been responded to within the Statement of Common Ground with Chelmsford City Council [REP1-028] or within Table H1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	6.12 - Response provided in the Landscape and Visual-Landscape Compensation section of this report
	6.5 - Response provided in the Alternatives - Technology Choice – Overhead Line and Underground Cables section of this report
7.Principle of Development, onshore route and Project need case	Matters raised in Section 7, aside from those referenced below, have previously been responded to within 5.6 Planning Statement [APP-085], section 3.2 of the Statement of Common Ground with Chelmsford City Council [REP1-028] or within Table H1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	7.13 - Response provided in the Planning Policy section of this report
	7.28 - Response provided in the Alternatives - Technology Choice – Overhead Line and Underground Cables section of this report
8.Other Key issues and likely significant effects	Matters raised in Section 8, aside from those referenced below, have previously been responded to within the Environmental Statement [APP-123] to [APP-298] and [AS-026] to [AS-027], sections 3.3 to 3.14 of the Statement of Common Ground with Chelmsford City Council [REP1-028] or

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	within Table H1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
8.5 – 8.34 Effect on Green Belt, Rural Area and Green Wedge	Matters raised in this section, aside from those referenced below, have previously been responded to within 5.6 Planning Statement [APP-085], section 3.2 of the Statement of Common Ground with Chelmsford City Council [REP1-028] or within Table H1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	8.5 – 8.18 - Response provided in the Planning Policy section of this report
	8.19 – 8.27 - Response provided in the Land Use - Green Belt section and the Planning Policy section of this report
	8.33 - Response provided in the Planning Policy section of this report
8.35 – 8.70 Great Waltham and Little Waltham	Matters raised in this section, aside from those detailed below, have previously been responded to within 5.6 Planning Statement [APP-085], section 3.2 of the Statement of Common Ground with Chelmsford City Council [REP1-028] or within Table H1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	8.53 - Response provided in the Landscape and Visual section of this report
8.73 – 8.84 Environmental Statement- Air Quality	Matters raised in this section have previously been responded to within Environmental Statement Chapter 7 – Air Quality [APP-147], section 3.4 of the Statement of Common Ground with Chelmsford City Council [REP1-028] or within Table H1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
8.85 – 8.145 Environmental Statement- Ecology and Biodiversity and Arboriculture	Matters raised in this section, aside from those referenced below, have previously been responded to within Environmental Statement Chapter 8 – Ecology and Biodiversity [AS-026], section 3.3 of the Statement of Common Ground with Chelmsford City Council [REP1-028] or within Table H1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	8.111 – 8.115 - Response provided in the Biodiversity, Ecology and Nature Conservation (Ecology and Biodiversity) section of this report
	8.116 – 8.117 - Response provided in the Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain section of this report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	8.121 – 8.122 - Response provided in the Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain section of this report
	8.126 - Response provided in the Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting section of this report
	8.145 - Response provided in the Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting section of this report
8.146 – 8.164 Health and Wellbeing	Matters raised in this section, aside from those referenced below, have previously been responded to within Environmental Statement Chapter 10 – Health and Wellbeing [APP-192], section 3.6 of the Statement of Common Ground with Chelmsford City Council [REP1-028] or within Table H1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	8.154 – Response provided in the Landscape and Visual section of this report
	8.158 – Response provided in the Landscape and Visual section of this report
8.165 – 8.282 Cultural Heritage and Archaeology	Matters raised in this section, aside from those referenced below, have previously been responded to within Environmental Statement Chapter 11 – Historic Environment [APP-208], section 3.7 of the Statement of Common Ground with Chelmsford City Council [REP1-028] or within Table H1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	8.199 - Response provided in the Historic Environment section of this report
	8.201 - Response provided in the Historic Environment section of this report
	8.204 – 8.205 - Response provided in the Historic Environment section of this report
	8.207 – 8.210 - Response provided in the Historic Environment section of this report
	8.238 - Response provided in the Historic Environment section of this report
	8.244 – 8.245 - Response provided in the Historic Environment section of this report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	8.250 – 8.282 - Response provided in the Historic Environment section of this report
8.283 – 8.444 Landscape and Visual	Matters raised in this section, aside from those referenced below, have previously been responded to within Environmental Statement Chapter 13 – Landscape and Visual [APP-226], section 3.8 of the Statement of Common Ground with Chelmsford City Council [REP1-028] or within Table H1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	8.302 – 8.304 - Response provided in the Landscape and Visual- Landscape Compensation section of this report
	8.312 - Response provided in the Landscape and Visual- Landscape Compensation section of this report
	8.333 & 8.334 - Response provided in the Landscape and Visual- Landscape Compensation section of this report
	8.337 - Response provided in the Landscape and Visual- Landscape Compensation section of this report
	8.355 – 8.369 - Response provided in the Landscape and Visual- Landscape Compensation section of this report
	8.375 – 8.378 - Response provided in the Landscape and Visual- Landscape Compensation section of this report
	8.385 - 8.392 - Response provided in the Landscape and Visual- Landscape Compensation section of this report
	8.395 - 8.397 - Response provided in the Landscape and Visual- Landscape Compensation section of this report
	8.401 – 8.402 - Response provided in the Landscape and Visual- Landscape Compensation section of this report
	8.405 - 8.408 - Response provided in the Landscape and Visual- Landscape Compensation section of this report
	8.410 - 8.416 - Response provided in the Landscape and Visual- Landscape Compensation section of this report
	8.418 - 8.425 - Response provided in the Landscape and Visual- Landscape Compensation section of this report
	8.432 - 8.435 - Response provided in the Landscape and Visual- Landscape Compensation section of this report
	8.437– 8.438 - Response provided in the Landscape and Visual- Landscape Compensation section of this report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	8.442 - Response provided in the Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting section and the Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain section of this report
	8.443 - Response provided in the Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting section of this report
8.445 – 8.478 Noise and Vibration	Matters raised in this section have previously been responded to within Environmental Statement Chapter 14 – Noise and Vibration [APP-256], section 3.5 of the Statement of Common Ground with Chelmsford City Council [REP1-028] or within Table H1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
8.479 – 8.497 Socio-economics, Recreation and Tourism	Matters raised in this section, aside from those referenced below, have previously been responded to within Environmental Statement Chapter 15 – Socio-economics Recreation and Tourism [APP-265], section 3.9 of the Statement of Common Ground with Chelmsford City Council [REP1-028] or within Table H1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	8.483 - Response provided in the Socio-economics, Recreation and Tourism section of this report
8.498 – 8.510 Traffic and Transport	Matters raised in this section have previously been responded to within Environmental Statement Chapter 16 – Traffic and Transport [APP-271], section 3.10 of the Statement of Common Ground with Chelmsford City Council [REP1-028] or within Table H1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
8.511 – 8.524 Design	Matters raised in this section, aside from those referenced below, have previously been considered through 5.15 Design Development Report [APP-122], 7.15 Design and Access Statement [APP-353], and 7.16 Design Approach for Site Specific Infrastructure [APP-354].
	8.521 – 8.522 - Response provided in the Good Design section of this report
	8.523 – Response provided in the Alternatives- Great and Little Waltham section and the Good Design section of this report
	8.524 - Response provided in the Good Design section of this report
8.525 – 8.556 Cumulative Effects	Matters raised in this section, aside from those referenced below, have previously been responded to within

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	Environmental Statement Chapter 17 – Cumulative Effects [APP-281], section 3.11 of the Statement of Common Ground with Chelmsford City Council [REP1-028] or within Table H1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	8.544 - Response provided in the Landscape and Visual-Landscape Compensation section of this report
	8.545 - Response provided in the Cumulative Effects section of this report
	8.548 - Response provided in the Cumulative Effects section of this report
	8.550 – 8.553 - Response provided in the Cumulative Effects section of this report
8.557 – 8.576 Other Matters	Matters raised in this section, aside from those referenced below, have previously been responded to within section 3.13 of the Statement of Common Ground with Chelmsford City Council [REP1-028] or within Table H1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	8.568 - Response provided in the Land Use (Agriculture and Soils) section of this report
8.577 – 8.579 Contaminated Land, Geology and Hydrogeology	Matters raised in this section have previously been responded to within Environmental Statement Chapter 9 – Contaminated Land Geology and Hydrology [APP-181], or within Table H1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
8.580 Hydrology, Land Drainage and Flood Risk	Matters raised in this section have previously been responded to within Environmental Statement Chapter 12 – Hydrology Land Drainage and Flood Risk [APP-221], or within Table H1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
9.Mitigation and compensation	Matters raised in Section 9, aside from those referenced below, have previously been responded to within the Environmental Statement [APP-123] to [APP-298] and [AS-026] to [AS-027], sections 3.3 to 3.14 of the Statement of Common Ground with Chelmsford City Council [REP1-028] or within Table H1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	9.3 - Response provided in the Landscape and Visual-Landscape Compensation section of this report
	9.13 - Response provided in the Landscape and Visual-Landscape Compensation section of this report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	9.20 – 9.22 - Response provided in the Landscape and Visual-Landscape Compensation section of this report
	9.23 – 9.26 - Response provided in the Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting section of this report
10.Draft Development Consent Order	Matters raised in Section 10, aside from those referenced below, have previously been responded to within section 3.12 of the Statement of Common Ground with Chelmsford City Council [REP1-028] or within Table H1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	10.14 – 10.15 - Response provided in the Historic Environment section of this report
	10.16 - Response provided in the Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain section of this report
11.Conclusions	Matters raised in Section 11, aside from those referenced below, have previously been responded to within the Environmental Statement [APP-123] to [APP-298] and [AS-026] to [AS-027], sections 3.3 to 3.14 of the Statement of Common Ground with Chelmsford City Council [REP1-028] or within Table H1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132].
	11.12- Response provided in the Landscape and Visual-Landscape Compensation section of this report
	11.21 - Response provided in the Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting section of this report
	11.38 - Response provided in the Landscape and Visual-Landscape Compensation section of this report
	11.40 - Response provided in the Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting section and the Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain section of this report
	11.51 - 11.52 - Response provided in the Cumulative Effects section of this report
Addendum to LIR	3.7 – 3.22 - Response provided in the Socio-economics, Recreation and Tourism section of this report

A.10 Brentwood Borough Council

Table A.10 The Applicant's Regard to Brentwood Borough Council's Local Impact Report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
1. Introduction	N/A – no response required, introductory content
2. Site description and surroundings/location	Introductory Content
	2.61 Responded to in the Historic Environment section
3 Details of the Proposal	N/A – no response required, introductory content
4 Planning History	N/A – no response required, introductory content
5 Relevant National and Local Planning Policy Framework	Policy context has been considered through 5.6 Planning Statement [APP-085] and 5.7 Policy Compliance Document [APP-086], and 8.4.2 Policy Compliance Tracker [REP1-133]
6 Assessment of Local Impacts – paragraphs 6.1 – 6.2	N/A – no response required, introductory content
6 Assessment of Local Impacts - Impact on Haverings Grove – paragraphs 6.3 – 6.10	Response is provided in Land Use - Green Belt section of this report
	6.7 – Response provided in the Traffic and Transport section of this report
	6.8 - Response provided in Socio-economics, Recreation and Tourism section of this report
6 Assessment of Local Impacts - Impact on Dunton Hills Garden Village – paragraphs 6.11 – 6.29	6.11 - 6.29 – Response provided in Alternatives - Dunton Hills Garden Village section of this report
	6.23 – Response provided in Socio-economics, Recreation and Tourism section of this report
6 Assessment of Local Impacts - Acceptability of the Environmental Statement - Air Quality– paragraphs 6.30-6.33	Matters raised in this part of Section 6, aside from those referenced below, have previously been responded to within 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147], Section 3.4 Air Quality of the Statement of Common Ground with Brentwood Borough Council [REP1-030], or within Table F1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
	6.33 – Response provided in Air Quality and Emissions (Air Quality) section of this report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
6 Assessment of Local Impacts - Acceptability of the Environmental Statement - Ecology and Biodiversity – paragraphs 6.34 – 6.42	Matters raised in this part of Section 6, aside from those referenced below, have previously been responded to within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [APP-158 and [AS-026], Section 3.3 Ecology and Biodiversity of the Statement of Common Ground with Brentwood Borough Council [REP1-030], or within Table F1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
	6.37, 6.38 – Response provided in Biodiversity, Ecology and Nature Conservation (Ecology and Biodiversity) of this report
	6.38 – Response provided in Draft Development Consent Order, Requirements and Management Plans section of this report
	6.39, 6.42 - Response provided in Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain section of this report
6 Assessment of Local Impacts - Acceptability of the Environmental Statement - Health and Wellbeing – paragraphs 6.43 – 6.47	Matters raised in this part of Section 6, aside from those referenced below, have previously been responded to within 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192], Section 3.6 Health and Wellbeing of the Statement of Common Ground with Brentwood Borough Council [REP1-030], or within Table F1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
	6.45, 6.46 – Response provided in Health and Wellbeing section of this report
6 Assessment of Local Impacts - Acceptability of the Environmental Statement - Historic Environment – paragraphs 6.48 – 6.55	Matters raised in this part of Section 6, aside from those referenced below, have previously been responded to within 6.11 Environmental Statement Chapter 11- Historic Environment [APP-208 and AS-068], Section 3.7 Historic Environment of the Statement of Common Ground with Brentwood Borough Council [REP1-030], or within Table F1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
	6.49, 6.50 – 6.52 – Response provided in Historic Environment section of this report
6 Assessment of Local Impacts - Acceptability of the Environmental Statement - Landscape and Visual – paragraphs 6.56 – 6.65	Matters raised in this part of Section 6, aside from those referenced below, have previously been responded to within 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], Section 3.8 Landscape and Visual of the Statement of Common Ground with Brentwood Borough Council [REP1-030], or within Table F1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
	6.59 - 6.61 – Response provided in Landscape and Visual section of this report
	6.62 – Response provided in Landscape and Visual - Landscape Compensation section of this report
	6.62, 6.63, 6.65 – Response provided in Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting section of this report
6 Assessment of Local Impacts - Acceptability of the Environmental Statement - Noise and Vibration – paragraphs 6.66 – 6.72	Matters raised in this part of Section 6 have previously been responded to within 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256], Section 3.5 Noise and Vibration of the Statement of Common Ground with Brentwood Borough Council [REP1-030], or within Table F1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
6 Assessment of Local Impacts - Acceptability of the Environmental Statement - Socio-economics, Recreation and Tourism – paragraphs 6.73 – 6.78	Matters raised in this part of Section 6 have previously been responded to within 6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265], Section 3.9 Socio-economics, Recreation and Tourism of the Statement of Common Ground with Brentwood Borough Council [REP1-030], or within Table F1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
6 Assessment of Local Impacts - Acceptability of the Environmental Statement - Traffic and Transport – paragraphs 6.79 – 6.89	Matters raised in this part of Section 6, aside from those referenced below, have previously been responded to within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271], or within Table F1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
	6.82, 6.83, 6.85, 6.87 – Response provided in the Traffic and Transport section of this report
7 Principle of Development and Alternatives	Response provided in the following sections of this report: Needs Case and Timing Alternatives - Offshore Alternatives Alternatives - Technology Choice – Overhead Line and Underground Cables Alternatives - Dunton Hills Garden Village
8 Cumulative Effects	Matters raised in this part of Section 6, aside from those referenced below, have previously been responded to within 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281], Section 3.10 Cumulative Effects of the Statement of Common Ground with Brentwood Borough Council [REP1-030], or within Table F1.1 of 8.4.1 Applicant's response to Relevant Representations [REP1-132]
	8.2 – 8.7 – Response provided in Cumulative Effects section of this report

Local Impact Report paragraph / section	Cross-Reference to the Applicant's Response
9 Draft Development Consent Order (dDCO)	Response provided in Draft Development Consent Order, Requirements and Management Plans section of this report
	9.8 – Response provided in Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain section of this report
10 Conclusion	10.8 – Response provided to in Landscape and Visual - Landscape Compensation section of this report.
	Other matters raised here also raised earlier in Local Impact Report and comments have been provided to those earlier sections
Appendix 1 Relevant Development Plan Policies (extracts from Brentwood Local Plan 2016-2033)	N/A – no response required, context content

Appendix B. Dunton Hills Garden Village Viability – Response to Savills Report

Appendix B

Dunton Hills Garden Village Viability – Response to Savills Report

B.1 Introduction

- B.1.1 The Local Impact Reports (LIRs) for Essex County Council (ECC) [REP1-161] and Brentwood Borough Council (BBC) [REP1-150] express concern about the potential effect that the Project will have on Dunton Hills Garden Village (DHGV). The LIRs refer to a limited number of specific issues such as the heritage sightlines within the development, the potential impact on one Local Equipped Area of Play (LEAP) and on landscape planting to the eastern boundary of DHGV. Those matters are dealt within the **8.8.2 Applicant's Comments on Local Impact Reports [Revision A]**, to which this document is Appendix B.
- B.1.2 The key concern expressed however is in relation to the viability and deliverability of the DHGV site. This concern is supported by a report by Savills. The Savills Report (included as Appendix D in ECC's LIR [REP1-161]) was commissioned by ECC with its remit being to provide an estimate of the broad impacts of the Project on property prices and the Residential Gross Development Value (RGDV) of DHGV and comment on how the Project might affect deliverability of DHGV.
- B.1.3 The **8.8.2 Applicant's Comments on Local Impact Reports [Revision A]** summarises the Applicant's position in relation to the Savills Report and the deliverability of DHGV and this appendix provides further details to support the Applicant's position in that respect.
- B.1.4 The Applicant disagrees with the findings of the Savills Report and considers that the Project will not adversely impact upon the deliverability of DHGV.
- B.1.5 Whilst the scope of this appendix is set out in the following chapter, the remainder of this chapter sets out some initial comments by the Applicant on the information within the Savills Report.

Applicant's Initial General Comments

- B.1.6 Paragraph 2.3.3 of the Savills Report refers to Figure 2.7 within the report, which shows the existing high pressure gas main running from the north to the south of the site on its eastern side, in a similar location to the proposed Norwich to Tilbury overhead line. The Savills Report states that '*...within 5m of which, no building easement is permitted.*'
- B.1.7 The Applicant would suggest that it is more appropriate to consider the constraint that a high-pressure gas pipeline provides with reference to the Pipelines Safety Regulations 1996 and Health and Safety Executive (HSE) guidance. This sets out inner, middle and outer zones associated with the pipeline where development is restricted. The inner zone extends out 30 m from the pipeline, the middle zone extends out 90 m from the pipeline and the outer zone extends out 250 m from the pipeline.
- B.1.8 The inner zone has the most restrictions on development, the middle zone limits significant development, and the outer zone limits vulnerable development or very

large numbers of people. The proposed route of the Norwich to Tilbury overhead line generally runs along the route of the high-pressure gas pipeline such that it is within its inner and middle zones, an area within which residential development as part of the DHGV is already constrained by the gas pipeline

- B.1.9 Notwithstanding the above, there are a number of statements in the Savills Report that the Applicant agrees with.
- B.1.10 Paragraph 3.1.5 of the Savills Report confirms that ‘... *a new overground or undergrounded line on the route currently proposed would not affect the location of any of the homes planned at the Garden Village in the current masterplan.*’ This statement is correct, subject to the Applicant agreeing the extent of the temporary construction area with the new DHGV site owners (LIH). This position is also supported by BBC in the committee reports it prepared in relation to the DHGV planning application.
- B.1.11 Paragraph 3.2.1 of the Savills Report confirms that ‘*National Grid does not consider there to be general minimum distances between properties and overhead lines and each instance must be dealt with on its merits.*’ Then paragraph 3.2.2 confirms that ‘*The only limitation on new development prescribed by National Grid is the statutory safety clearances. For example, the minimum clearance for 400kV overhead lines is 8.6-16.3m to roads, 5.3m to platforms where a person could be standing, 3.1-5.3m to trees and 4.0m to street lighting.*’ The Applicant can confirm that these statements are correct, other than the statutory safety distance to a normal road, which is 8.1 m as set out on page 16 of National Grid’s Design guidelines for development near pylons and overhead lines⁹².
- B.1.12 Paragraph 3.2.3 of the Savills Report then confirms that ‘*The consequence of these requirements is that there are a range of examples of residential and other development that have been carried out beneath and adjacent to overhead lines.*’ Again, the Applicant can confirm that this statement is correct.
- B.1.13 Paragraph 4.1.2 of the Savills Report confirms that their primary research did not find a significant effect of power lines on new build house prices (see also paragraphs 4.3.1-2 and 4.4.1). The Applicant and its valuation advisors, CBRE, concur with this statement.
- B.1.14 Finally, paragraph 6.1.4 of the Savills Report states that ‘*We further understand that an agreed viability position has not yet been reached with negotiations continuing between the Applicant [for the DHGV development] and Council.*’ The Applicant is awaiting an update on this situation from ECC/BBC following a meeting with the councils on 29 January 2026. However, it is also noted that the Relevant Representation submitted to the Examination by LIH **[RR-0421]** states at paragraph 16 that ‘*It is anticipated that the S106 will be finalised and the decision notice issued imminently.*’ It seems, therefore that the s106 should be completed shortly and its completion should help to allay the concerns of ECC with regard to the viability of DHGV.

⁹² National Grid (2019) *Design Guidelines for Development Near Pylons and High Voltage Overhead Power Lines*

B.2 Scope of Report

B.2.1 As stated in the introduction, this appendix provides further detail to support the Applicant's position in relation to the Savills Report and the deliverability of DHGV.

B.2.2 The appendix is set out to follow the structure of the **8.8.2 Applicant's Comments on Local Impact Reports [Revision A]** in this regard as follows:

- Chapter 3 – sets out the Applicant's position that property or land value is not a material planning consideration
- Chapter 4 – explains that, notwithstanding the above, the Applicant has provided information in the application documents on the matter and now provides this appendix in order to assist the Examining Authority in further in considering this matter
- Chapter 5 – sets out the detailed response of the Applicant's appointed specialist advisors, CBRE, to the Savills Report
- Chapter 6 – discusses whether the theoretical impact on DHGV suggested by Savills calls for an alternative to the current overhead line proposal
- Chapter 7 – notwithstanding CBRE's response to the Savills Report, considers theoretically what the impact on DHGV would be if the Savills Report was accepted and whether that theoretical impact should preclude the grant of a Development Consent Order (DCO) for the Project.

B.3 Property and Land Value – a Material Planning Consideration?

UK Planning Legislation

B.3.1 UK planning legislation provides the statutory context within which material considerations operate.

B.3.2 Section 70 of the Town and Country Planning Act 1990 (as amended) relates to general considerations when determining planning applications. Section 70(2) states that in dealing with such an application, authorities shall have regard to:

- *'(a) the provisions of the development plan, so far as material to the application,*
- *(aza) a post-examination draft neighbourhood development plan, so far as material to the application,*
- *(aa) any considerations relating to the use of the Welsh language, so far as material to the application;*
- *(b) any local finance considerations, so far as material to the application, and*
- *(c) any other material considerations.'*

B.3.3 Section 70(4) confirms that 'local finance consideration' means:

- *'(a) a grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown, or*

- *(b) sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy.'*

B.3.4 Section 70 of the 1990 Act should also be considered in conjunction with Section 38(6) of the Planning and Compulsory Purchase Act 2004. This states that:

'If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise'.

B.3.5 As such, a material consideration is a matter that should be taken into account in determining a planning application or on an appeal against a planning decision. However, the relevant legislation does not define nor exhaustively list what may be regarded as a material consideration.

Planning Practice Guidance and Case Law

B.3.6 Matters that are considered material in the determination of planning applications include: overlooking/loss of privacy; overshadowing; parking; highway safety; traffic; noise; layout and density of building; design, appearance and materials; government policy; previous planning decisions (including appeal decisions); and other potential environmental effects, such as in relation to heritage, landscape and nature conservation.

B.3.7 It has however been held via the courts, in particular in *Stringer v. Minister of Housing and Local Government* [1970] 1 WLR 1281, that planning is concerned with land use in the public interest, not private interests such that matters such as impact on property values and the loss of a view are not considered material in the determination of planning applications.

B.3.8 This position is also confirmed in Planning Practice Guidance: Determining a planning application⁹³ where paragraph 008 states:

'The scope of what can constitute a material consideration is very wide and so the courts often do not indicate what cannot be a material consideration. However, in general they have taken the view that planning is concerned with land use in the public interest, so that the protection of purely private interests such as the impact of a development on the value of a neighbouring property or loss of private rights to light could not be material considerations'.

The Planning Act 2008

B.3.9 The legal context for applications for DCOs is set by the Planning Act 2008 (PA 2008). Section 104(3) of the PA 2008 states that applications for DCOs:

'must be decided in accordance with any relevant national policy statement, except to the extent that one or more of subsections (4) to (8) applies'.

B.3.10 Subsections (4) to (8) set out the exceptions as:

- *'(4) this subsection applies if the Secretary of State is satisfied that deciding the application in accordance with any relevant national policy statement would lead to the UK being in breach of any of its international obligations;*

⁹³ Ministry of Housing, Communities and Local Government (2023) *Guidance: Determining a planning application*

- (5) *this subsection applies if the Secretary of State is satisfied that deciding the application in accordance with any relevant national policy statement would lead to the Secretary of State being in breach of any duty imposed on the Secretary of State by or under any enactment;*
- (6) *this subsection applies if the Secretary of State is satisfied that deciding the application in accordance with any relevant national policy statement would be unlawful by virtue of any enactment;*
- (7) *this subsection applies if the Secretary of State is satisfied that the adverse impact of the proposed development would outweigh its benefits;*
- (8) *this subsection applies if the Secretary of State is satisfied that any condition prescribed for deciding an application otherwise than in accordance with a national policy statement is met’.*

B.3.11 In making the decision Section 104(2) of the PA 2008 requires the Secretary of State (SoS) to have regard to the following:

- *‘any Local Impact Report;*
- *any matters prescribed;*
- *any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State decision’.*

B.3.12 The PA 2008 therefore sets out that the primary consideration for deciding applications for DCOs are the relevant National Policy Statements (NPSs).

The Applicant’s Position

B.3.13 The relevant NPSs to the determination of the Norwich to Tilbury DCO application are the Overarching NPS for Energy (EN-1) (2024), the NPS for Renewable Energy Infrastructure (EN-3) (2024) and the NPS for Electricity Networks Infrastructure (EN-5) (2024). None of these NPSs include any specific policy regarding property values.

B.3.14 Accordingly, it is the Applicant’s position that property values are not a material planning consideration for the purposes of determining the Norwich to Tilbury DCO application.

B.4 Information to Assist the Examining Authority (ExA)

Application Documents

B.4.1 The Applicant’s original position was to scope out effects on house prices. This is set out in paragraph 15.3.4 of **6.15 Environmental Statement (ES) Chapter 15 – Socio-economics, Recreation and Tourism [APP-265]**.

B.4.2 This position was taken primarily due to the absence of any accepted methodology for this type of assessment and due to the complexities surrounding any assessment where the alignment/specific proximity to particular residential settlements is flexible within Limits of Deviation (LoD) (and therefore allows for some variation). It was also confirmed that no ES for a DCO application had previously devised a methodology for such an assessment and the approach proposed was consistent with case law and policy guidance, which notes impacts on purely private interests, such as property prices, are not a material consideration in planning determinations.

- B.4.3 Paragraph 15.3.5 of **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265]**, however, confirms that the **6.20 Scoping Opinion [APP-297]** stated that:
- ‘With regards to operation, the Scoping Report does not provide a detailed route or confirm the likely receptors and consequences of the impact. The Inspectorate does not consider there is sufficient information to rule out the potential for significant effects. An assessment of likely significant effects should be provided’.*
- B.4.4 In light of this the ES considered effects on property values and in this regard it refers to the House Prices: Impact of Beaulay-Denny Grid Infrastructure⁹⁴ study that was commissioned by Scottish Renewables to consider the effects on property values arising from the operation of the Beaulay-Denny overhead line (**6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265]**, paragraphs 15.3.7-12).
- B.4.5 The conclusion of the study was that the Beaulay-Denny overhead line, a 130-mile-long electricity transmission line that became fully operational in 2015, with properties located very close to it, where visual impacts could not be mitigated by screening and where there was an audible hum and/or a perceived health risk, had limited effects on properties offered for sale. The study also concluded that those limited effects were not an issue for all purchasers, such that the actual effect was a matter of individual perception.
- B.4.6 The study looked at house prices along the route of the overhead line and compared them to house prices in both the local regions and in Scotland between 2004 and 2022. This enabled consideration of effects during the construction phase and during the first seven years of operation. It also detailed discussions with local estate agents along the line of the route to understand their views.
- B.4.7 The study demonstrated that while there had been a 14% reduction in the volume of house sales in the area of the overhead line route, compared to Scotland (where there was a 4% increase), house price growth in the area was greater since 2015 (41%) when compared to the rest of Scotland (30%).
- B.4.8 The study also concluded that once the overhead line had been constructed, and could be seen by potential house purchasers, effects fell away to be replaced by more usual considerations for house purchasers, such as interest rates, cost of living and supply of houses. As such, the overall conclusion of the study was that there was no discernible effect as a result of the operation of the Beaulay Denny overhead line.
- B.4.9 Notwithstanding the above, and the Applicant’s position that private interests such as property and land values are not a material consideration in the determination of planning or DCO applications, the ES includes a socio-economic assessment on the effect on DHGV in Section 15.5. This assessment confirms that, in Environmental Impact Assessment (EIA) terms, no significant socio-economic effects are anticipated.
- B.4.10 Further detail on the conclusions of this assessment is provided in Chapter 6 of this report.

⁹⁴ BiGGAR Economics (2024) *House Prices: Impact of Beaulay-Denny Grid Infrastructure*

Further Information

- B.4.11 Notwithstanding the Applicant's position that property and land values are not a material consideration, the Applicant has continued to liaise with ECC and BBC in relation to DHGV seeking to allay their concerns on the matter. The Applicant intends that this liaison will continue throughout the Examination as necessary, with the aim being to resolve the concerns and seek agreement with the Councils on the matter.
- B.4.12 The Applicant also recognises that, in making a decision on an application for a DCO, the SoS is required to have regard to, inter alia; '*any other matters which the SoS thinks are both important and relevant to the decision*'.
- B.4.13 Since the concern in relation to property and land values in relation to DHGV continues to be raised in the LIRs, the Applicant has considered this matter on a theoretical basis, in order to assist the ExA in its determination of the application.
- B.4.14 Accordingly, in addition to the response provided in the **8.8.2 Applicant's Comments on Local Impact Reports [Revision A]**, this appendix provides a response to the Savills Report that includes a detailed review of that report by the Applicant's specialist advisors, CBRE. CBRE's review is set out in the following chapter.

B.5 Review of the Savills Report

- B.5.1 As set out in the preceding chapter it is the Applicant's position, having considered the relevant legislative context, national planning guidance and policy, that private interests such as property and land values are not a material consideration in the determination of planning or DCO applications.
- B.5.2 Notwithstanding this, in order to seek to assist the ExA in considering all matters raised in Representations submitted to the Examination, this chapter sets out CBRE's (the Applicant's specialist advisor) review of the Savills Report.

Impact on Property Values in DHGV

- B.5.3 The presence of overhead powerlines has the potential to impact Gross Development Value (GDV) in two ways:

- **By reducing overall quantum of development**

The National Grid publication National Grid Design Guidelines for Development Near Pylons and High Voltage Overhead Power Lines was first published by National Grid in 2003 and updated in 2019. The guidelines were developed by National Grid to address matters associated with developing sites crossed by, or in the vicinity of, pylons and high voltage overhead lines. The guidance provides a number of case studies illustrating varying approaches to incorporating overhead line corridors within developments.

Overall, the guidelines aim to promote the successful development of sites crossed by overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment.

The original route corridor of the proposed overhead line ran through the DHGV site. Following initial discussions with the Council and the consideration of constraints (identified from available resources, site visits and feedback) the route

was adjusted to run down the eastern edge of the DHGV site, broadly following the route of an existing high-pressure gas main. The intention was to minimise any direct impact upon proposed built development in DHGV.

This is a large site which provides significant opportunities to mitigate loss. There is no suggestion that the quantum of development is adversely affected by the overhead line, given other pre-existing constraints and mitigation through design as the site progresses further through the planning and post-consent design stages.

- **Impact on property value**

On smaller sites there are fewer opportunities for mitigation through design than on larger sites such that the presence of overhead lines can potentially have an impact on the proposed development. Similarly, if sites are poorly designed, the presence of an overhead line can potentially have an increased impact than is necessary.

The Applicant's general experience, however, is that there is a trend towards the development of higher value properties in proximity to overhead lines because of the open aspect the overhead line corridor provides and/or proximity to Public Open Space (POS).

Proper planning, design and mitigation reduces or removes any injurious effect.

B.5.4 The Applicant disagrees with the viability assessment in the Savills Report and takes a position that the Savills Report:

- Incorrectly links viability to target land prices. Insofar as GDV is impacted by the presence of an overhead line then any loss is reflected in land value and will be felt by the landowner, not the developer. It is, of course, the case that in that scenario the landowner will have recourse to compensation
- Does not set out how the 132 kV line removal is taken into account in the assessment.

B.5.5 In this instance Land Investment Holdings (LIH) have very recently purchased the land. They will have been aware of the Project prior to the acquisition and consequently, any adverse impact is highly likely to have been taken into account in the purchase price.

B.5.6 The Relevant Representation (RR) submitted to the Examination by LIH [RR-0421] is generally supportive of the Project (noting the benefits accruing from the removal of the 132 kV line, that crosses the site east to west, associated with the Project) and does not raise any issues in relation to viability.

B.5.7 On the understanding that, following the National Grid guidelines including mitigation through proper planning and design, there is no impact on the quantum of development then CBRE does not consider that there will be a demonstrable impact on GDV and, therefore, viability of the DHGV development.

B.5.8 Notwithstanding that position, in the event that either quantum of development or values were impacted then the effect of this would not be felt until near completion of the DHGV development (noting that the development is due to start in the west and work eastwards – where the proposed overhead line is sited). Further the impact of time on the return would rapidly erode any impact on GDV and, therefore, land value.

B.5.9 It is noted by CBRE that:

- The Savills Report sets out that the impact to viability of DHGV is somewhere between 1% and 3.7% in GDV. In assessing the viability of a development informed assumptions are made in relation to all inputs with an allowance for a margin of error. Insofar as GDV is impacted then this variance is insignificant and is, effectively, allowed for in the assessment of viability
- As referenced in the Savills Report, in 2023 London School of Economics published a discussion paper, *Are Friends Electric*⁹⁵, which looked at the impact of the development of an overhead line on pre-existing housing, which is not the situation here. As discussed above, any impact on GDV will be reflected in land value. We know that the site has very recently been acquired by a developer who has full knowledge of the overhead line – insofar as they considered the presence of the overhead line would have an adverse impact this will have been reflected in the price paid.
- There is no real-world example where development comes forward in the shadow of pylons having a demonstrable impact on viability.

B.5.10 It is, therefore, CBRE's clear view that there is no demonstrable impact on the delivery of DHGV because:

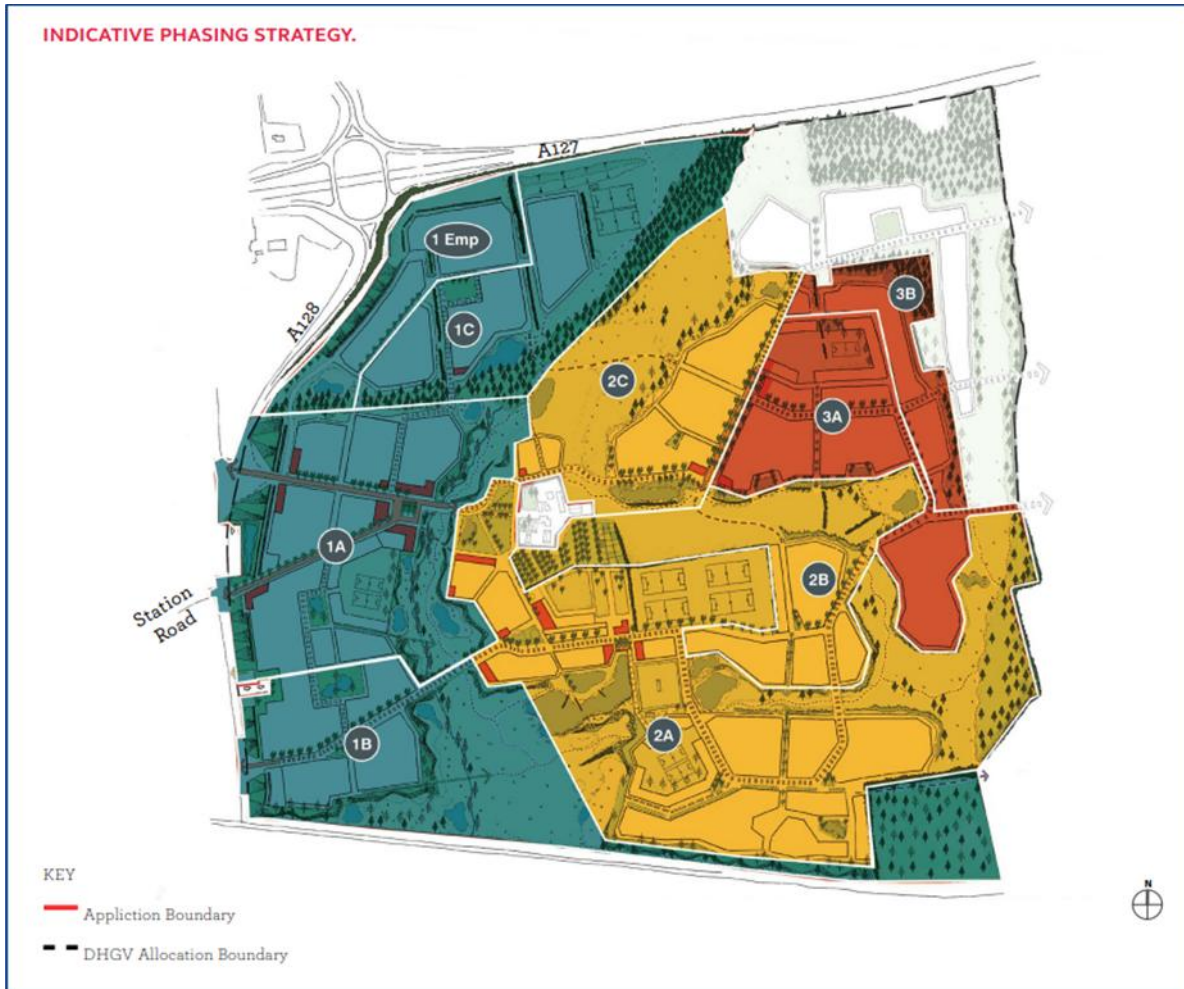
- It is not considered that there will be any impact on GDV
- If there were an impact on GDV then this would be reflected in land value
- Insofar as a landowner suffers a loss resulting from the presence of the overhead line it has a route to compensation for its loss.

B.5.11 The approved Phasing Programme for DHGV confirms that the only construction works that will take place within the next five years relate to Phases 1A, 1B and 1C (please see a copy of the approved Phasing Plan at Figure A.1). These phases of development are the furthest away from the overhead line. By the time the construction of Phase 2A, Phase 2B and Phase 2C of DHGV begins the overhead line will have been in place for two, five and six years, respectively. Accordingly, when much of the DHGV development is being constructed the overhead line will already be an established feature.

B.5.12 This position has recently been supported by LIH in their RR **[RR-0421]** at paragraph 19.

⁹⁵ London School of Economics (2023) *Are friends electric? Valuing the social costs of power lines using house prices*

Image B.1 Approved DHGV phasing plan



- B.5.13 Due to the phasing of the construction of DHGV and the overhead line, people that will buy the homes closest to the overhead line will do so with it already having been in situ for a number of years. As confirmed by the Beaulieu Denny Study (referred to in Chapter 4 of this document), once the overhead line had been constructed, and could be seen by potential house purchasers, any adverse effects it had on potential house purchasers fell away to be replaced by the more usual considerations for purchasers, such as interest rates, the cost of living and the overall supply of houses, together with the benefits arising from a well progressed development scheme (including provision of social infrastructure). Accordingly, the Applicant is advised that there is unlikely to be any discernible effect as a result of the presence of the Norwich to Tilbury overhead line.
- B.5.14 Fundamentally, therefore, it is the Applicant's position that the Project will not affect the build out or the deliverability of DHGV.

Summary Conclusion

- B.5.15 As set out previously, CBRE's advice is that it does not consider that the development of the Project will impact GDV to any meaningful significant extent – certainly not enough to impact viability – and that any loss suffered will be suffered by the landowner (in land value) and which has recourse to compensation.
- B.5.16 Land value arising from development is affected by variation including GDV, build costs, finance costs and the wider financial landscape. It is noted the 'worst case

scenario' that Savills have concluded is a 3.7% impact on GDV. When compared with other ordinary economic factors that can affect land prices, this is a very small impact and is typically accounted for within a contingency.

- B.5.17 Furthermore, it is noted that no-one (including the recent purchaser of the DHGV site – LIH) has said that DHGV will not come forward if the Project is constructed.
- B.5.18 Indeed, the Relevant Representations submitted on behalf of LIH confirm that the DHGV development is predicated on the removal of the 132 kV line. The cost of the developer having to facilitate the removal or diversion does not appear to have been factored into Savills consideration of DHGV viability which, if correct, risks creating an impression of viability absent the NGET scheme and associated works which is overstated.

B.6 Should Alternatives be Considered?

- B.6.1 As set out in the preceding chapters, it is the Applicant's position, that the Project will not have a demonstrable impact upon the delivery or viability of DHGV. On that basis it is not considered that there is a need, having regard to the relevant legislative context, national planning guidance and policy, for alternatives to the proposed overhead line to be considered any further than the Applicant has done so whilst designing the overhead line and preparing the DCO application.
- B.6.2 In particular, the Applicant has taken account of the guidance provided by the Holford Rules⁹⁶. The Holford Rules are a set of guiding principles for planning and designing overhead lines to minimise their visual impact and environmental effects.
- B.6.3 Rule 1 of the Holford Rules is to avoid altogether, if possible, the major areas of highest amenity value. The areas of highest amenity value included in this Rule are:
- Areas of Outstanding Natural Beauty
 - National Parks
 - Heritage Coasts
 - World Heritage Sites.
- B.6.4 Rule 2 then goes on to seek to '*avoid smaller areas of high amenity value, or scientific interests by deviation; provided that this can be done without using too many angle towers*'.
- B.6.5 DHGV does not include any major areas of highest amenity value or any smaller areas of high amenity value or scientific interest.
- B.6.6 Most relevant to DHGV is Rule 7 which requires approaches to urban areas to be through industrial zones, where they exist; and when pleasant residential and recreational land intervenes between the approach line and the substation, to go carefully into the comparative costs of the undergrounding, for lines other than those of the highest voltage.
- B.6.7 The Norwich to Tilbury overhead line is of the highest voltage (400 kV) and so undergrounding should not necessarily be the solution having regard to any potential effects on DHGV. Notwithstanding this, undergrounding was considered in response to consultation feedback by the Applicant when designing the Project, as set out in

⁹⁶ National Grid (n.d.) *Holford Rules*

5.15 Design Development Report [APP-122]. The conclusion of this consideration was that undergrounding was not preferred due to it having greater effects on the development footprint of DHGV.

- B.6.8 The **5.15 Design Development Report (DDR) [APP-122]** sets out the guidance provided by the Holford Rules at paragraph 1.3.32, with Section 10.4 of the DDR specifically referring to design considerations having regard to DHGV.
- B.6.9 DHGV has been considered by balancing consistency with the Holford Rules against potential direct and indirect effects on the Project. The key design change with regard to DHGV was the decision to amend the route of the overhead line, which was originally proposed to run through the DHGV site, so that it ran along the eastern periphery of the site instead.
- B.6.10 Important in this consideration was the location of an existing gas pipeline that runs along the eastern periphery of the site. The pipeline, along with its associated safety zones, provided a corridor for the overhead line to be sited within which did not directly affect proposed development on the DHGV site.
- B.6.11 As such, in the vicinity of DHGV the Norwich to Tilbury overhead line 2023 preferred draft alignment was amended to take forward a preference to follow the gas pipeline corridor for a greater distance such that the overhead line would not introduce a new constraint in this location.
- B.6.12 This approach to consideration of the Holford Rules is consistent with NPS EN-5 (2024) which requires applicants to embody the design principles where possible (paragraph 2.9.13). EN-5 (2024), at paragraph 2.9.20, also confirms that it is the government's position that overhead lines should be the strong starting presumption for electricity networks developments in general (with this presumption being reversed only when proposed developments will cross part of a nationally designated landscape such as a National Park or a National Landscape).
- B.6.13 EN-5 (2024) paragraph 2.9.23 recognises that there may be cases where, though no part of the proposed overhead line crosses a designated landscape, a high potential for widespread and significant adverse landscape and/or visual impacts along certain sections of its route may result in recommendations to use undergrounding for relevant segments of the overhead line. In these cases, paragraph 2.9.24 of EN-5 (2024) indicates that the SoS must weigh the feasibility, cost, and any harm of the undergrounding against:
- *'the adverse implications of the overhead line proposal;*
 - *the cost and feasibility of re-routing overhead lines or mitigation proposals for the relevant line section'*
- B.6.14 There are no such widespread and significant adverse effects as a result of the Project in the vicinity of DHGV and, in any event, even if there were, in such cases development consent should only be granted for underground sections of a proposed line over an overhead alternative if the benefits accruing clearly outweigh any extra economic, social, or environmental impacts that it presents, the mitigation hierarchy has been followed, and that any technical obstacles associated with it are surmountable (EN-5 (2024) paragraph 2.9.25).
- B.6.15 The implication of undergrounding the overhead line in the vicinity of DHGV are discussed further below.

Implications of Undergrounding

- B.6.16 Utilising underground cables would require additional space to accommodate sealing end compounds and additional corridor widths within the development areas of DHGV such that there would be a loss of developable land from DHGV.
- B.6.17 The **5.15 Design Development Report [APP-122]** at paragraph 10.4.4 notes that EN-5 confirms that the routeing of overhead lines near to residential property is not, as a point of principle, unacceptable. It also notes that there are detailed design opportunities, including as outlined in National Grid's Design Guidelines for Development Near Pylons and High Voltage Overhead Power Lines publication on existing examples of housing in close proximity to overhead lines, with the potential to reduce amenity effects that can be effective in maximising outcomes, particularly in circumstances such as DHGV where the overhead line will be in a peripheral location to the eastern side of the site and detailed design is yet to be undertaken. On this basis it is considered that requests to use underground cable past DHGV are not justified by national policy.
- B.6.18 Paragraph 10.4.5 of the **5.15 Design Development Report [APP-122]** then confirms that the area is not the subject of any designations relevant to change the presumption in favour of an overhead line as set out in EN-5. Additionally, it confirms (as recognised by both BBC and the site owners) that the alignment does not directly restrict development on any areas that are not already constrained by the safety zones related to the existing gas pipeline. In contrast, the use of underground cable through DHGV would be likely to directly restrict development on areas not currently affected by the Project.
- B.6.19 As such, in light of the policy support within the 2024 NPSs for overhead lines in areas not subject to particular designations, and the potential for additional effects on development area of underground cables, it is considered that an overhead line is the appropriate design technology in this location.
- B.6.20 It follows therefore that the Applicant's position is that the Project is far from meeting the test for undergrounding under EN-5 (2024) and even if it did, that as costs could run to close to £100 million for the minimum distance they would not be justified.

T-pylons

- B.6.21 Appendix C to the Design Development Report 2024 **[REP1-069]** provides commentary as to the locations along the Project where the use of alternatives to traditional lattice pylons may be appropriate in landscape and visual terms, and within those areas, the technical considerations that would arise.
- B.6.22 The Applicant's position is set out at paragraphs 2.5.9 - 2.5.11 of **5.15 Design Development Report [APP-122]** and demonstrates how pylon type has been considered as part of the mitigation hierarchy.
- B.6.23 **5.15 Design Development Report [APP-122]** explains the context within which T-pylons need to be considered, including Ofgem considerations. It also explains that T-pylons are less adaptable to varied terrains and require more substantial access infrastructure and that attention needs to be given to the transitions between pylon types.
- B.6.24 As such **5.15 Design Development Report [APP-122]** confirms that it was 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 where there could be a design preference for T-pylons, the need to mitigate for unacceptable effects from lattice pylons is not considered to be engaged and, accordingly, there is no justification for T-pylons to be used on the Project.

B.7 Does Any Impact on DHGV Preclude the Grant of a DCO for the Project?

- B.7.1 As set out previously, it is the Applicant's position, having considered the relevant legislative context, national planning guidance and policy, that private interests such as property and land values are not a material consideration in the determination of planning or DCO applications.
- B.7.2 Furthermore, it is also the Applicant's position that, contrary to the case put forward by Savills, the Project will not impact GDV to any meaningful significant extent, certainly not enough to impact viability, and that any loss that may be suffered will be suffered by the landowner (in land value) and for which they have a recourse to compensation.
- B.7.3 Notwithstanding this, in order to seek to assist the ExA in considering all matters raised in Representations submitted to the Examination, the Applicant has considered, hypothetically, the situation whereby property values in DHGV are affected by the Project as set out in the Savills Report.

The Impact on DHGV as Contended by Savills, ECC and BBC

- B.7.4 The Savills Report sets out that the impact to viability of DHGV is somewhere between 1% and 3.7% in GDV. Even the worst-case scenario in this regard (3.7%) would be within margins of error of ordinary housing viability and would likely be accounted for in contingency.
- B.7.5 The only other potential impacts that the Project may have on DHGV is in relation to pylon TB229. The Applicant does not consider there is likely to be a direct impact on the quantum of development and paragraph 3.4 of 29 July 2025 Committee Report into the DHGV planning application states that: '*... it was not anticipated that N2T [Norwich to Tilbury] would have any material impact on the delivery of DHGV*'.
- B.7.6 The Applicant has noted however that the LIH Relevant Representation **[RR-0421]** indicates that the pylon might have a very minor impact on a few of the 3,700 units currently proposed in the approved DHGV planning application. The Applicant's current commitment is that it will look to microsite the location of this pylon, within the DCO's LoDs, in order to avoid any loss of units. Discussions to this end are underway with LIH as also confirmed in their Relevant Representation, with LIH stating that it may be able to withdraw its objection in this regard.
- B.7.7 An important matter to also consider in respect of this potential impact is that the current proposals for DHGV are subject to an application for outline planning permission and have been designed to masterplan level only. As such, the exact details of the final layout submitted via a reserved matters application can be designed to accommodate and further reduce any potential effect of this pylon.

DCO Decision-Making Context

- B.7.8 As set out previously, the primary consideration for deciding applications for DCOs are the relevant NPSs.
- B.7.9 Section 3 of NPS EN-1 (2024) confirms the urgent need for significant amounts of new large scale low carbon energy infrastructure to meet the government's energy objectives and paragraph 3.2.6 of EN-1 confirms that this need is urgent.
- B.7.10 Paragraphs 3.3.65-66 of NPS EN-1 (2024) reiterate that the need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives is urgent in order to enable the new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security.
- B.7.11 In particular, paragraph 3.3.62 of NPS EN-1 (2024) explains that the '*Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure*'. NPS EN-5 (2024), at paragraph 1.1.5 confirms that CNP infrastructure includes:
- 'for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System'.*
- B.7.12 The paragraph goes on to confirm that: '*These are viewed by the government as being CNP infrastructure and should be progressed as quickly as possible*'.
- B.7.13 The Project is therefore CNP infrastructure.
- B.7.14 With regard to determining applications for such infrastructure, NPS EN-1 (2024) paragraph 3.3.63 states that the urgent need for CNP infrastructure will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy, and confirms that the government strongly supports the delivery of CNP infrastructure, and it should be progressed as quickly as possible.
- B.7.15 Similarly, paragraph 4.1.3 of NPS EN-1 (2024) confirms that, '*Given the level and urgency of need for infrastructure of the types covered by the energy NPSs set out in Part 3 of this NPS, the Secretary of State will start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused.*'
- B.7.16 This position is reinforced by EN-1 (2024) paragraph 4.1.7 which confirms that, for CNP infrastructure, where there would still be residual adverse effects after the implementation of mitigation measures, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases.
- B.7.17 Whilst that presumption does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero, or to residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk, none of those exceptions are relevant in the case of the Project.

- B.7.18 Accordingly, there is a strong presumption in favour of granting a DCO for the Project, even if there are residual adverse effects.

The Significance of DHGV and its Development Plan Context

- B.7.19 The relevant development plan is the Brentwood Local Plan 2016-2033 which was adopted on 23 March 2022⁹⁷.
- B.7.20 Strategic Policy MG01 confirms that the plan's Spatial Strategy sets out a requirement of 7,752 new residential dwellings (net) to be built in the borough over the plan period 2016–2033. These dwellings are anticipated to be provided at an annual average rate of 300 dwellings per year to 2023/24, followed by 400 dwellings per year to 2029/30 and then 984 dwellings per year to 2032/33.
- B.7.21 In terms of growth distribution, Policy MG01 outlines housing requirements for designated neighbourhood plan areas in the borough. This includes a requirement of 2,530 houses in the West Horndon Parish/Neighbourhood, which will be covered by strategic allocations R01 (DHGV) and R02 (West Horndon Industrial Estate).
- B.7.22 Policy R01, which relates to the DHGV strategic allocation anticipates that DHGV will deliver a mix of uses to comprise around 1,650 dwellings in the plan period (as part of an overall indicative capacity of around 4,000 dwellings), with the remainder to be delivered beyond 2033.
- B.7.23 The 1,650 dwellings anticipated to be delivered in DHGV during the plan period represent approximately a fifth (21.3%) of the dwellings to be delivered by the plan, and over half (65.2%) of the dwellings anticipated to be delivered within the West Horndon Parish/Neighbourhood.
- B.7.24 In this context, the non-delivery of DHGV would have a significant effect on anticipated housing delivery in Brentwood during the current plan period.
- B.7.25 However, no-one is claiming that DHGV will not be delivered as a result of the Project. Indeed, the worst-case scenario as set out in the Savills Report, is that the impact on DHGV would be 3.7% in GDV which, as confirmed by the Applicant's specialist advisor, CBRE, is within normal margins of error.
- B.7.26 That impact, which is disputed by the Applicant, would not affect the overall number of houses delivered by DHGV, instead any effect it would have would be in relation to s106 obligation provisions, most likely the provision of affordable housing for which adopted planning policy allows flexibility subject to viability justification.

Affordable Housing Provision

- B.7.27 With regard to adopted planning policy, Policy R01 of the Brentwood Local Plan relates to the DHGV strategic allocation. Part 4 of Policy R01 states:
- *'4. Development proposals shall deliver an appropriate variety of housing types and tenures in accordance with the Borough's identified needs and the specific needs of Dunton Hills Garden Village. They shall include the provision of (inter alia):*
 - *c. affordable housing in accordance with Policy HP05'.*

⁹⁷ Brentwood Borough Council (2022) *Brentwood Local Plan 2016-2033*

- B.7.28 Policy HP05 states that the Council will require the provision of 35% of the total number of residential units to be provided and maintained as affordable housing within all new residential development sites on proposals of 10 or more units.
- B.7.29 Part 3 of Policy HP05, however recognises that where robust viability evidence demonstrates that the full amount of affordable housing cannot be delivered, the Council will negotiate a level of on-site affordable housing that can be delivered taking into account the mix of unit size, type and tenure and any grant subsidy received. As such, the provision of 35% affordable housing is not fixed, it is a target that the Council wishes to aim for and is willing to reduce should scheme viability dictate.
- B.7.30 At present there is no indication from the DHGV site owners that the 35% affordable housing target is not achievable. Therefore, hypothetically, even if this did end up being the case, provision of less affordable housing, justified in viability terms, is not contrary to policy.
- B.7.31 In this regard, the Brentwood Monitoring Report on Housing Delivery 2021/22⁹⁸ sets out that the annual estimate of affordable housing need in Brentwood is calculated as 107 households per year, as set out in the Strategic Housing Market Assessment Part 2. Paragraph 23 of the Monitoring Report on Housing Delivery 2021/22 confirms that this represents 30.6% of the annual projected household growth in the Borough between 2016 and 2033.
- B.7.32 This would therefore suggest that if, hypothetically, for viability reasons (whether they were directly related to the Project or not), affordable housing provision on DHGV fell to 30.6%, it would still be providing an appropriate amount of affordable housing on a pro rata basis to meet the estimate of affordable housing need. Furthermore, there is no policy reason that less affordable housing would not be acceptable, subject to viability.

Socio-Economic Assessment

- B.7.33 As set out previously, the Applicant acceded to the request in the **6.20 Scoping Opinion [APP-297]** and considered house prices in the ES (**6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]**). **6.15 Chapter 15 - Socio-economics Recreation and Tourism [APP-265]** also includes an assessment on the effect the Project likely would have on DHGV. The assessment concluded that the DHGV site is of local importance with a low sensitivity, in EIA terms (paragraph 15.5.39).
- B.7.34 Table 15.26 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]** recognises that the south-eastern section of the DHGV allocation overlaps with the proposed DCO Order Limits relating to pylon construction, construction access and temporary third-party works (the 132 kV overhead line removal). It confirms, however, that the majority of the DHGV allocation does not overlap with the Project and that the Project considered the DHGV allocation in its design in order to manage interactions, in particular by routing the proposed overhead line along the existing gas pipeline and within a corridor formed by the Building Proximity Distance (BPD).
- B.7.35 The ES confirms that, taking into account mitigation measures set out in the **7.2 Outline Code of Construction Practice (CoCP) [Revision B]** and **7.3 Outline**

⁹⁸ Brentwood Borough Council (2022) *Brentwood Monitoring Report on Housing Delivery 2021/22*

Construction Traffic Management Plan (CTMP) [APP-309], access to the DHGV site for construction purposes would be maintained such that potential severance is anticipated to be mitigated, resulting in a very low magnitude of impact. Accordingly, a temporary, short-term, negligible and not significant residual effect is anticipated to DHGV during construction of the Project.

B.7.36 Table 15.31 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]** considers the operational effects of the Project on DHGV and again confirms that the Project has been designed to follow the existing gas pipeline within a corridor formed by the BPD in order to reduce potential effects. As such, the Project was not considered to have a potential impact in relation to severance or sterilisation of land for future development during operation. Accordingly, a permanent, long-term, neutral and not significant effect was concluded.

B.7.37 In EIA terms therefore no significant socio-economic effects are anticipated on DHGV as a result of the Project.

Decision-Making Analysis

B.7.38 As set out in the earlier section of this chapter, the NPSs are the primary consideration for determining this DCO application and, given the Project's status as CNP infrastructure, there is a strong presumption in favour of granting a DCO for the Project, even if there are residual adverse effects.

B.7.39 With regard to the matters discussed in this appendix, the Applicant notes that paragraph 5.13.9 of NPS EN-1 (2024) requires the SoS to have regard to potential socio-economic impacts of new energy infrastructure if relevant and important to its decision. However, the Applicant also notes that paragraph 5.13.10 of NPS EN-1 (2024) confirms that the SoS may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence, particularly in view of the need for energy infrastructure.

B.7.40 The SoS should also consider any relevant positive provisions an applicant has made, or is proposing to make, to mitigate impacts, any legacy benefits that may arise and any options for phasing development in relation to the socio-economic impacts (EN-1 (2024) paragraph 5.3.11).

B.7.41 As set out in Chapter 5 of this appendix, the Applicant's specialist advisor, CBRE, has confirmed that the evidence provided to seek to support concerns with regard to the viability and deliverability of DHGV is not substantiated. Furthermore, even if it was accepted, the worst-case scenario identified would not have a demonstrable adverse impact, let alone a significant one.

B.7.42 The socio-economic impact that is claimed is therefore not sufficiently evidenced, nor is it supported by the owners of the DHGV site, and it should, therefore, be given limited weight in the determination of the application.

B.7.43 Turning to the case made in relation to DHGV's status as a garden village, neither 2024 NPSs EN-1 nor EN-5 specifically refer to garden villages. There is therefore no special status afforded to garden villages in the NPSs which are the primary consideration for determining this DCO application.

B.7.44 Given the context within which applications for CNP infrastructure, such as the Project, should be determined within, as set out by the 2024 NPSs, there is nothing to warrant refusal of the application, in particular when weighed against the urgent

need for it to provide the necessary reinforcement to the transmission system in the Southeast of England and East Anglia so that proposed new renewable power sources can be connected.

- B.7.45 Accordingly, there is no reason having regard to claimed potential effects on DHGV that refusal of the Project could be justified.

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